



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

NOTICE OF POTENTIAL LIABILITY
DEMAND FOR PAYMENT
URGENT LEGAL MATTER
PROMPT REPLY NECESSARY
SENT VIA ELECTRONIC MAIL

Mr. Larry D. Ogden
Lighthouse Electric Cooperative, Inc.
P.O. Box 600
Floydada, Texas 79235-0600
LarryO@lighthouse.com

Re: Notice of Potential Liability and Demand for Payment
F. J. Doyle Salvage Superfund Site
Leonard, Fannin County, Texas, SSID # 061D

Dear Sir/Madam:

Under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended (CERCLA, commonly known as the federal "Superfund" law), the United States Environmental Protection Agency (EPA) has the authority to respond to a release or threat of a release of hazardous substances, pollutants or contaminants into the environment – that is, for stopping further contamination from occurring and for cleaning up or otherwise addressing any contamination that has already occurred. EPA has documented that such a release has occurred at the F. J. Doyle Superfund Site in Leonard, Fannin County, Texas (Site). EPA has spent, or is considering spending, public funds to investigate and control releases of hazardous substances or potential releases of hazardous substances at the Site. Based on information presently available, EPA has determined that Lighthouse Electric Cooperative, Inc. (Lighthouse Electric) may be a potentially responsible party (PRP) under CERCLA for cleanup of the Site or for costs EPA has incurred in responding to the contamination on the Site.

Explanation of Potential Liability

Under Section 107(a) of CERCLA, 42 U.S.C. § 9607(a), PRPs may be held liable for all costs incurred by the EPA (including interest) in responding to any release or threatened release of hazardous substances at the Site. PRPs include current and former owners and operators of the Site, as well as persons who arranged for treatment and/or disposal of any hazardous substances found at the Site, and persons who accepted hazardous substances for transport and selected the site to which the hazardous substances were delivered.

Based on the information collected, the EPA has determined that Lighthouse Electric may be liable under Section 107(a) of CERCLA with respect to the Site as a generator who arranged for the disposal, treatment or transportation of hazardous substances at the Site. Specifically, the EPA has reason to believe that Lighthouse Electric arranged for the disposal, treatment, or transportation of electrical transformers containing polychlorinated biphenyls (PCBs) to the Site. Enclosure 1 is a copy of the evidence on Lighthouse Electric's involvement with the Site.

Background

To date, the EPA has taken response actions at the Site under the authority of the Superfund Program. Below is a brief description of the actions taken at the Site:

- In May 2015, the Texas Commission on Environmental Quality referred the Site to the EPA.
- In May 2018, the EPA investigated the surface and sub-surface soils to determine the lateral and vertical extent of contamination at the Site and surrounding areas.
- The EPA conducted a removal action at the Site beginning on November 5, 2018, removing and disposing of PCB-contaminated soils and building elements.

Demand for Payment

In accordance with Section 104 of CERCLA, 42 U.S.C. § 9604, the EPA has already taken certain response actions, which are listed above, and incurred certain costs in response to conditions at the Site. The EPA is seeking to recover from PRPs the response costs and all the interest expended at the Site and authorized to be recovered under Section 107(a) of CERCLA. The total response costs identified through August 31, 2020, for the Site are \$3,833,694.38. Under Section 107(a) of CERCLA, EPA hereby makes a demand for payment from you and other PRPs for the above amount plus all interest authorized to be recovered under Section 107(a) of CERCLA. A summary of these costs reported through August 31, 2020, is enclosed as Enclosure 2.

The EPA would like to encourage communication between you, other PRPs and the EPA regarding the Site and this demand for payment. To assist you in your efforts to communicate, please find in Enclosure 3 a list of names and addresses of PRPs to whom this letter is being sent.

Ability to Pay Settlement

While this letter demands that Lighthouse Electric reimburse the EPA for all funds spent at the Site, the EPA is aware that the financial ability of some PRPs to contribute toward the payment of response costs at a site may be substantially limited. If you believe, and can document, that you fall within this category, please contact Mr. David Eppler by phone at 214-665-6529 or via email at eppler.david@epa.gov for information on ability to pay settlements. In response, you will receive a package of information about such settlements and a form to fill out with information about your

finances, and you will be asked to submit financial records including federal tax returns. If the EPA concludes that Lighthouse Electric has a legitimate inability to pay the full amount demanded, the EPA may offer a schedule for payment over time or a reduction in the total amount demanded from you.

Some or all of the costs associated with this notice may be covered by current or past insurance policies issued to Lighthouse Electric. Most insurance policies will require that you timely notify your carrier(s) of a claim against you. To evaluate whether you should notify your insurance carrier(s) of this demand, you may wish to review current and past policies, beginning with the date of Lighthouse Electric's first contact with the F. J. Doyle Site. Coverage depends on many factors, such as the language of the particular policy and state law.

Also, please note that, because the EPA has a potential claim against you, you must include the EPA as a creditor if you file for bankruptcy. The EPA reserves the right to file a proof of claim or an application for reimbursement of administrative expenses.

Resources and Information for Small Businesses

In January of 2002, President Bush signed into law the Superfund Small Business Liability Relief and Brownfields Revitalization Act. This Act contains several exemptions and defenses to CERCLA liability, which we suggest that all parties evaluate. You may obtain a copy of the law at <http://www.gpo.gov/fdsys/pkg/PLAW-107publ118/pdf/PLAW-107publ118.pdf> and review the EPA guidance regarding these exemptions at <http://cfpub.epa.gov/compliance/resources/policies/cleanup/superfund/>

The EPA has also created a number of helpful resources for small businesses. The EPA has established the National Compliance Assistance Clearinghouse as well as Compliance Assistance Centers which offer various forms of resources to small businesses. You may inquire about these resources at <http://www.epa.gov/compliance/compliance-assistance-centers>. In addition, the EPA Small Business Ombudsman may be contacted at <http://www.epa.gov/resources-small-businesses/forms/contact-us-about-resources-small-businesses>. Finally, the EPA has developed a fact sheet about the Small Business Regulatory Enforcement Fairness Act ("SBREFA") and information on resources for small businesses, which is included with Enclosure 4 with this letter and available on the Agency's website at <http://www.epa.gov/compliance/small-business-resources-information-sheet>.

Your Response

Please send a written response to this cost recovery demand, within thirty (30) days of receipt of this letter, to:

Mr. David Eppler (SEDAE)
Enforcement Officer
Superfund and Emergency Management Division, Cost Recovery Section
U.S. EPA, Region 6
1201 Elm St, Suite 500
Dallas, Texas 75270
Telephone: (214) 665-6529
Email: eppler.david@epa.gov

If a response from you is not received within thirty (30) days, the EPA will assume that you have declined to reimburse the Superfund for the Site response costs, and the EPA will evaluate its enforcement options pursuant to CERCLA accordingly.

If you have questions regarding the response actions taken at the Site, please contact Mr. David Eppler at 214-665-6529. If you or your attorney have legal questions, please direct them to Mr. Leonard Schilling, Superfund Attorney, at 214-665-7166 or schilling.leonard@epa.gov.

Thank you for your prompt attention to this matter.

Sincerely yours,

WREN STENGER

Digitally signed by WREN STENGER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=WREN STENGER,
0.9.2342.19200300.100.1.1=68001003651787
Date: 2020.11.16 13:57:56 -06'00'

Wren Stenger
Director
Superfund and Emergency Management Division

Enclosures:

- 1 Evidence of Liability
- 2 EPA Costs
- 3 List of Potentially Responsible Parties
- 4 Small Business Resource Information Sheet

ENCLOSURE 1

EVIDENCE OF LIABILITY F. J. DOYLE SALVAGE SUPERFUND SITE



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VI
INTERFIRST TWO BUILDING, 1201 ELM STREET
DALLAS, TEXAS 75270

September 24, 1984

Mr. Harry H. Jung
Jung & Marley
P.O. Box 456
Crosbyton, Texas 79322

RE: Lighthouse Electric Cooperative, Inc.,
Floydada, Texas, TSCA Docket No. VI-106C

Dear Mr. Jung:

Enclosed is a copy of the Consent Agreement and Final Order filed in connection with the above referenced proceedings. Please note that the Order requires the penalty to be paid within sixty (60) days after the effective date of the Order. A Cashier's check or Certified check payable to the United States of America should be forwarded to the Regional Hearing Clerk, U.S. ENVIRONMENTAL PROTECTION AGENCY, 1201 Elm Street, Interfirst Two Building, Dallas, Texas 75270.

Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "E A Hurst".

Elizabeth A. Hurst
Attorney
Office of Regional Counsel

Enclosure

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION VI
DALLAS, TEXAS

FILED

SEP 21 2 25 PM '84

IN RE:
LIGHTHOUSE ELECTRIC COOPERATIVE,
INC.
FLOYDADA, TEXAS
RESPONDENT.

\$
\$
\$
\$
\$
\$
\$

TSCA DOCKET NO. VI- 106C
EPA REGION VI
CONSENT AGREEMENT
AND
FINAL ORDER

PRELIMINARY STATEMENT

1. This proceeding for the assessment of a civil penalty was instituted pursuant to Section 16 of the Toxic Substances Control Act, as amended (15 U.S.C. 2615), hereinafter referred to as "TSCA". The proceeding was instituted by Complaint and Notice of Opportunity for Hearing served upon Lighthouse Electric Cooperative, Inc., Floydada, Texas, hereinafter referred to as "Respondent", on or about June 6, 1984, by certified mail, return receipt requested No. P 592 953 273, charging that Respondent failed to properly dispose of PCBs and to prepare an annual document on its PCBs in violation of Section 15 of TSCA (15 U.S.C. 2614).

2. Respondent admits the jurisdictional allegation of the Complaint. Respondent neither admits nor denies the specific factual allegations of the Complaint.

3. Respondent hereby unconditionally waives its right to a hearing on any issue of law or fact herein. Such waiver shall become unconditional upon the Complainant's execution of the Consent Agreement and the Regional Administrator's approval of same as indicated by this entry of the Final Order incorporated herein and made a part hereof.

4. Respondent consents to the issuance of said Final Order and consents to the payment of the civil penalty in the amount set out in said Order.

FINDINGS OF FACT

5. On or about April 9, 1984, Respondent was conducting its business at East Highway 70, Floydada, Texas 79235.

6. On or about April 9, 1984, Respondent was inspected by a representative of EPA pursuant to Section 11 of TSCA, 15 U.S.C. 2610.

7. On or about April 9, 1984, a written notice of inspection was issued at the commencement of the inspection to a representative of Respondent as required by Section 11(a) of TSCA, 15 U.S.C. 2610(a).

8. On June 30, 1983, July 6, 1983 and July 11, 1983, Respondent sold to one Frank Doyle, an operator of a transformer salvage yard in Leonard, Texas, a number of junk transformers. The said junk transformers were undrained mineral oil type transformers that were sold for junk without testing the oil for PCB content and concentration.

9. The Respondent disposed of PCBs in a manner other than described in 40 CFR 761.60(b)(4) by selling undrained mineral oil type transformers as junk without first draining the oil and disposing of it in a manner consistent with 40 CFR 761.60(a).

10. Respondent contracted with Martha C. Rose Chemicals, Inc., on January 26, 1984 to dispose of two (2) PCB containers which contained at least 45 kilograms of PCBs in each container and 161 PCB Large High Voltage Capacitors. Prior to the above-referenced contract the PCB Items were being stored.

11. As of April 12, 1984, Respondent had failed to prepare an annual document on its PCBs.

12. Since the date of the inspection, Respondent has stated and verified

to Complainant that all of the violations cited in the complaint have been corrected and that Respondent is now in full compliance with TSCA and the regulations thereunder.

CONCLUSIONS OF LAW

13. Respondent is a "person" as that term is defined in 40 CFR 761.3 and as such is subject Part 761 of the TSCA regulations, 40 CFR 761.1(b).

14. 40 CFR 761.3(2) requires that oil-filled transformers whose PCB concentration is unknown must be assumed to be PCB-Contaminated Electrical Equipment.

15. "Disposal" is defined at 40 CFR 761.3(h) to mean intentionally or accidentally to discard, throw away, or otherwise complete or terminate the useful life of PCBs and PCB Items.

16. Respondent has violated Section 15(1)(C) of TSCA, 15 U.S.C. 2614(1)(C), by failing to properly dispose of PCB-Contaminated Electrical Equipment as required by 40 CFR 761.60(b)(4), a rule promulgated pursuant to Section 6(e) of the Act, 15 U.S.C. 2605(e).

17. 40 CFR 761.180(a) requires each owner or operator of a facility using or storing at one time at least 45 kilograms of PCBs contained in PCB containers or 50 or more PCB Large High Voltage Capacitors to develop and maintain records on its PCBs and to prepare an annual document by July 1st covering the previous calendar year. In addition, the required annual documents and records provided for in 40 CFR 761.180(a) must be maintained for at least five (5) years after the facility ceasing using or storing PCB Items in the prescribed quantities.

18. Respondent has violated Section 15(1)(C) of TSCA, 15 U.S.C. 2614(1)(C), by failing to prepare PCB annual documents as required by 40 CFR 761.180(a), a rule promulgated pursuant to Section 6(e) of the Act, 15 U.S.C. 2605(e).

ORDER

Pursuant to authority granted in Section 16(a)(2) of TSCA, 15 U.S.C. 2615(a)(2), upon consideration of the above Findings of Fact and Conclusions of Law which are hereby adopted and made a part hereof, and upon consideration of the nature, circumstances, extent, and gravity of the alleged violation, and with respect to the Respondent, its ability to pay, the effect on its ability to continue to do business, its history of prior PCB violations, and Respondent's degree of culpability, and after consideration of the entire record herein, it is this 24th day of September 1984, ORDERED that Lighthouse Electric Cooperative, Inc., Floydada, Texas, pay a civil penalty in the amount of Four Thousand Dollars (\$4,000) within sixty (60) days of receipt of this ORDER, said penalty to be paid by cashier's check or certified check payable to the United States of America and forwarded to the Regional Hearing Clerk, U.S. Environmental Protection Agency, Region 6, 1201 Elm Street, Interfirst Two Building, Dallas, Texas 75270.

DATE

8/31/1984

Alton Higginbotham
Lighthouse Electric Cooperative, Inc.
Respondent

DATE

9/12/84

Allyn M. Davis
Allyn M. Davis, Director
Air and Waste Management Division

It is so ordered. This ORDER shall become effective immediately.

Dick Whittington
Dick Whittington, P.E.
Regional Administrator

Dated this 21 day of September 1984, at Dallas, Texas.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Consent Agreement and Final Order was placed in the United States Mail, postage prepaid, certified mail, return receipt requested, No. P 455 259 153 on this 24th day of September 1984, addressed to Mr. Harry H. Jung, Jung & Marley, P. O. Box 456, Crosbyton, Texas 79322.


Elizabeth A. Hurst
Attorney at Law



Record of Communication	<input type="checkbox"/> phone call <input type="checkbox"/> discussion <input type="checkbox"/> field trip <input type="checkbox"/> conference <input type="checkbox"/> other (specify)	
	Record of Item Checked Above	
To: The File	From: Donna Mullins, EPA	Date: 6/21/95
		Time: 1300 hours
Subject: Site Visit to Frank Doyle Facility, Leonard, Texas		

Summary of Communication

On June 21, 1995 I went to the Frank Doyle site to discuss the sample results from the May 23-24, 1995 sampling effort at the Frank Doyle site. Based on this sampling effort, PCB contamination was identified both on and off the site. The purpose of this visit was to inform Mr. Doyle that the contamination exists and request that he initiate a cleanup as soon as possible. Present at the meeting were Mr. Frank Doyle, Ex. 6 Personal Privacy (PP) Peter Charles, Worldwide Reclamation and myself. Based on the May 23-24, 1995 sampling results, Mr. Doyle's contractor, Worldwide Reclamation, put together a minimum cost analysis of \$261, 400.00 to cleanup the site. Mr. Doyle said that he didn't the money for the cleanup but he needed a week to check all of his options. He further ask what would happen if he didn't conduct the cleanup. I explained to him that I was working under the jurisdiction of the Toxic Substances Control Act (TSCA), which requires that the owner operator of the site clean it up. I further explained that the thrust of TSCA is an administrative penalty, which could potentially penalize his business for improper disposal on a per day basis. I told him that the Agency is more interested in getting a cleanup, than collecting penalties. I told him that if he couldn't conduct the cleanup, this case would be referred to the Superfund, Emergency Response Program for their consideration on cleanup. I described in general terms how the Superfund, Emergency Response Program works. I told him that a request for cleanup would probably be made on him and potentially his past customers. If no one accepted responsibility for the cleanup, Superfund could cleanup the site themselves, provided it met their criteria, and seek to recover cleanup costs later. I told him that I wasn't sure how far Superfund went to recoup cleanup costs, i.e. personal assets. I gave Mr. Doyle until 6/28/95 to decide upon this matter before I referred it to Superfund.

Mr. Doyle gave additional information about the operation of this site. He has been junking transformers at the site since approximately 1974. From the time he started operating at the site until date unknown, Mr. Doyle did not require lab analysis of the oil content. Based on the EPA August 30, 1983 PCB Inspection, Mr. Doyle had oil in excess of 50 ppm PCB stored at this site. He said that he had acquired some transformers from the Floydada Lighthouse Electric Cooperative, Floydada, Texas that were stored in the area on the south side of the site where PCB contamination has been identified. He also stated that he has sprayed the site on various occasions with transformer oil to kill the weeds. He has also given the oil to various sources over the years for killing weeds, etc.

Conclusions, Action Taken or Required

In conclusion, I told Mr. Doyle that I would call him on the morning of June 27, 1995 to acquire as to whether he will accept responsibility for the cleanup of the site. I also told him that I would send him the complete copy of the file.

Information Copies To:

EPA Form 1300-6

February 1, 1985

Frank J. Doyle, Leonard, Texas, TSCA Docket No. VI-94C/ Request for
Concurrence in Reduction of Penalty

Elizabeth A. Hurst
Attorney

Mr. David Stangel (EN-342)
Environmental Protection Specialist

Region VI requests a reduction in the civil penalty prayed for in the
above-referenced cause from \$3,000.00 to \$50.00.

STATEMENT OF FACTS

On January 25, 1984, Region VI issued a complaint against Frank J. Doyle alleging violations of Section 15(1)(C) of TSCA, 15 U.S.C. §2614(1)(C), by failing to comply with regulations 40 CFR §§761.40(c), 761.65(c)(7)(ii), and 761.65(c)(8), to wit: failure to mark a PCB storage container with the required M_L PCB label, failure to prepare and implement a SPCC Plan and to record batch records on its PCB storage containers. Using the penalty policy printed in Federal Register, Vol. 45, No. 70, Wednesday, April 9, 1980, a penalty of \$3,000.00 was assessed against the Respondent.

On January 31, 1984, the Respondent (presumably Ex. 6 Personal Privacy (PP)) since there are indications that Mr. Doyle is illiterate) forwarded to Region VI a crude letter indicating that he had always told his customers that he would not accept PCB transformers nor PCB oil. He further claimed that the oil the EPA inspector found on his premises originated from Lighthouse Electric Cooperative, Inc., Floydada, Texas.

Based on the above information, an EPA inspector was sent to Lighthouse Electric Cooperative, Inc. for a PCB TSCA inspection. This inspection lead to Region VI issuing a complaint against the company for improper disposal. This matter was settled on September 24, 1984 for \$4,000.00.

On October 18, 1984, the Regional Hearing Clerk requested that an Administrative Law Judge be appointed to the Doyle proceedings. An Order of Designation followed on November 15, 1984, appointing Judge Greene to the case. During this time, Region VI attempted to contact Mr. Doyle by phone. He was never in during business hours, so a settlement conference by telephone was held on the first Saturday in December 1984.

During this settlement conference it became evident that Mr. Doyle was basically illiterate and was in severe financial trouble. The IRS has made plans to come in and start auctioning off his property. Because of Mr. Doyle's educational background and socio-economic status, he does not have a financial statement and has little understanding of what the document would entail, however, his wife did send us a recent IRS letter showing the DoYLES' problem with paying their back taxes.

JUSTIFICATION FOR REDUCTION OF PENALTY

1. Though Mr. Doyle does not have a financial statement verifying his poor financial status, it is evident he has an inability to pay the proposed penalty of \$3,000.00. (See, Attachment "A".)
2. Respondent did lead the Agency to the company who sold him the PCB oil, which resulted in a further enforcement action that has since been settled.
3. The PCB oil has since been removed from Mr. Doyle's property and Mr. Doyle makes it a practice not to accept PCB oil, PCB Items, and/or PCB contaminated materials.
4. EPA, Region VI, has not issued a prior complaint for violations of the PCB regulations.

Please inform me of your decision in this matter at your earliest possible convenience, since the Administrative Law Judge in this matter would like to close this case in an expeditious manner.

Enclosure

April 18, 1985

MEMORANDUM

SUBJECT: Frank J. Doyle, Leonard, Texas, TSCA Docket
No. VI-94C/Consent Agreement and Final Order

FROM: Elizabeth A. Hurst
Attorney (60RC)

TO: Dick Whittington, P.E.
Regional Administrator (6A)

REQUESTED ACTION

Complainant and Respondent request the Regional Administrator to approve the enclosed Consent Agreement by executing the Final Order.

SUMMARY OF THE CASE

On July 25, 1984, EPA issued a complaint against Frank J. Doyle, an operator of a salvage yard, alleging that he had failed to mark a 500 gallon PCB storage container with the H₁ PCB label, improperly stored PCBs by failing to prepare and implement a SPCC Plan and failed to record batches of PCBs added to or taken from the PCB containers in violation of TSCA. A penalty of \$3,000 was proposed in the complaint.

Mr. Doyle responded to the complaint by letter dated January 31, 1984. (It was evident from this correspondence that Mr. Doyle has a minimum amount of formal education). In the letter, he told EPA that he received the PCB oil from Lighthouse Electric Cooperative, Inc. He further stated that he had warned Lighthouse Electric that he does not accept PCB oil.

Based on this information, EPA requested a TSCA inspection of Lighthouse Electric. The inspection resulted in an enforcement action, which culminated in the company paying a \$4,000 fine. The company did admit it had improperly given the PCB oil to Mr. Doyle.

After Lighthouse Electric was concluded, we again initiated contact with Mr. Doyle. During our conversations it became clear Mr. Doyle is virtually illiterate and is in extreme financial hardship. The IRS had started the process of auctioning off Mr. [redacted] Doyle's possessions. Once I had received some documentation of these facts, I forwarded a regional request to Headquarters for a penalty reduction. On February 28, 1985, Headquarters informed the region that they had concurred on the reduction of the penalty down to \$50.00.

A Consent Agreement was then drafted and thoroughly explained to Mr. Doyle. On April 15, 1985, EPA finally received the signed Agreement from Mr. Doyle. At this time, Mr. Doyle and the Complainant request your approval of the Consent Agreement as set forth in the attached Final Order.

Enclosure

60RC:100ST:1C:86551:4-18-85

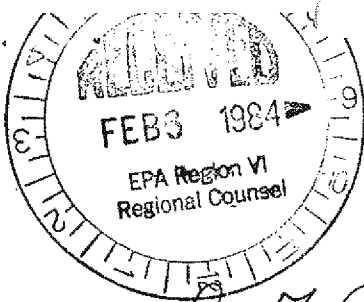
Stokes

(GAW-PP)
Mount

(GAW-P)
Dyer

(GAW)
Davis

(GAW)
Stokes



Jan. 31, 1984

Frank J Doyle
P.O. Box 312
Leonard, Tex 75451
Ph. 214 587-3342

I F.J. Doyle am requesting a hearing on this Complaint Notice.

I am not guilty. I did not know I had any bad oil. I told every one I ever bought transformers from, that I did not want any transformers that had PCB oil in them. They all assured me there was none in any they sold me. They said if they had bad oil, it would have to be marked on the container. & the man that come to check my oil in Aug. looked at all the containers & had & there wasn't any thing marked on any of them saying there was Bad oil. I told him I did not have any bad oil, But he was welcome to check & you can ask him about this. So I had no way of knowing I had any bad oil, or that the people, was lying to me. So I am not guilty of any wrong doing to my ~~the~~ knowledge.

I went through my ~~receipt~~ receipts & this has to be where I bought the transformers, they are the only ones

I bought around that time.
The dates were 6-30-83 7-6-83
7-11-83 All come from Lighthouse-
Electric Cooperative Inc. Floydada, Tex.

Thank you
J. Doyle



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VI
INTERFIRST TWO BUILDING, 1201 ELM STREET
DALLAS, TEXAS 75270

September 24, 1984

Mr. Harry H. Jung
Jung & Marley
P.O. Box 456
Crosbyton, Texas 79322

RE: Lighthouse Electric Cooperative, Inc.,
Floydada, Texas, TSCA Docket No. VI-106C

Dear Mr. Jung:

Enclosed is a copy of the Consent Agreement and Final Order filed in connection with the above referenced proceedings. Please note that the Order requires the penalty to be paid within sixty (60) days after the effective date of the Order. A Cashier's check or Certified check payable to the United States of America should be forwarded to the Regional Hearing Clerk, U.S. ENVIRONMENTAL PROTECTION AGENCY, 1201 Elm Street, Interfirst Two Building, Dallas, Texas 75270.

Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "E A Hurst".

Elizabeth A. Hurst
Attorney
Office of Regional Counsel

Enclosure

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION VI
DALLAS, TEXAS

FILED

SEP 21 2 25 PM '84

IN RE:
LIGHTHOUSE ELECTRIC COOPERATIVE,
INC.
FLOYDADA, TEXAS
RESPONDENT.

\$
\$
\$
\$
\$
\$
\$

TSCA DOCKET NO. VI- 106C
EPA REGION VI
CONSENT AGREEMENT
AND
FINAL ORDER

PRELIMINARY STATEMENT

1. This proceeding for the assessment of a civil penalty was instituted pursuant to Section 16 of the Toxic Substances Control Act, as amended (15 U.S.C. 2615), hereinafter referred to as "TSCA". The proceeding was instituted by Complaint and Notice of Opportunity for Hearing served upon Lighthouse Electric Cooperative, Inc., Floydada, Texas, hereinafter referred to as "Respondent", on or about June 6, 1984, by certified mail, return receipt requested No. P 592 953 273, charging that Respondent failed to properly dispose of PCBs and to prepare an annual document on its PCBs in violation of Section 15 of TSCA (15 U.S.C. 2614).

2. Respondent admits the jurisdictional allegation of the Complaint. Respondent neither admits nor denies the specific factual allegations of the Complaint.

3. Respondent hereby unconditionally waives its right to a hearing on any issue of law or fact herein. Such waiver shall become unconditional upon the Complainant's execution of the Consent Agreement and the Regional Administrator's approval of same as indicated by this entry of the Final Order incorporated herein and made a part hereof.

4. Respondent consents to the issuance of said Final Order and consents to the payment of the civil penalty in the amount set out in said Order.

FINDINGS OF FACT

5. On or about April 9, 1984, Respondent was conducting its business at East Highway 70, Floydada, Texas 79235.

6. On or about April 9, 1984, Respondent was inspected by a representative of EPA pursuant to Section 11 of TSCA, 15 U.S.C. 2610.

7. On or about April 9, 1984, a written notice of inspection was issued at the commencement of the inspection to a representative of Respondent as required by Section 11(a) of TSCA, 15 U.S.C. 2610(a).

8. On June 30, 1983, July 6, 1983 and July 11, 1983, Respondent sold to one Frank Doyle, an operator of a transformer salvage yard in Leonard, Texas, a number of junk transformers. The said junk transformers were undrained mineral oil type transformers that were sold for junk without testing the oil for PCB content and concentration.

9. The Respondent disposed of PCBs in a manner other than described in 40 CFR 761.60(b)(4) by selling undrained mineral oil type transformers as junk without first draining the oil and disposing of it in a manner consistent with 40 CFR 761.60(a).

10. Respondent contracted with Martha C. Rose Chemicals, Inc., on January 26, 1984 to dispose of two (2) PCB containers which contained at least 45 kilograms of PCBs in each container and 161 PCB Large High Voltage Capacitors. Prior to the above-referenced contract the PCB Items were being stored.

11. As of April 12, 1984, Respondent had failed to prepare an annual document on its PCBs.

12. Since the date of the inspection, Respondent has stated and verified

to Complainant that all of the violations cited in the complaint have been corrected and that Respondent is now in full compliance with TSCA and the regulations thereunder.

CONCLUSIONS OF LAW

13. Respondent is a "person" as that term is defined in 40 CFR 761.3 and as such is subject Part 761 of the TSCA regulations, 40 CFR 761.1(b).

14. 40 CFR 761.3(2) requires that oil-filled transformers whose PCB concentration is unknown must be assumed to be PCB-Contaminated Electrical Equipment.

15. "Disposal" is defined at 40 CFR 761.3(h) to mean intentionally or accidentally to discard, throw away, or otherwise complete or terminate the useful life of PCBs and PCB Items.

16. Respondent has violated Section 15(1)(C) of TSCA, 15 U.S.C. 2614(1)(C), by failing to properly dispose of PCB-Contaminated Electrical Equipment as required by 40 CFR 761.60(b)(4), a rule promulgated pursuant to Section 6(e) of the Act, 15 U.S.C. 2605(e).

17. 40 CFR 761.180(a) requires each owner or operator of a facility using or storing at one time at least 45 kilograms of PCBs contained in PCB containers or 50 or more PCB Large High Voltage Capacitors to develop and maintain records on its PCBs and to prepare an annual document by July 1st covering the previous calendar year. In addition, the required annual documents and records provided for in 40 CFR 761.180(a) must be maintained for at least five (5) years after the facility ceasing using or storing PCB Items in the prescribed quantities.

18. Respondent has violated Section 15(1)(C) of TSCA, 15 U.S.C. 2614(1)(C), by failing to prepare PCB annual documents as required by 40 CFR 761.180(a), a rule promulgated pursuant to Section 6(e) of the Act, 15 U.S.C. 2605(e).

ORDER

Pursuant to authority granted in Section 16(a)(2) of TSCA, 15 U.S.C. 2615(a)(2), upon consideration of the above Findings of Fact and Conclusions of Law which are hereby adopted and made a part hereof, and upon consideration of the nature, circumstances, extent, and gravity of the alleged violation, and with respect to the Respondent, its ability to pay, the effect on its ability to continue to do business, its history of prior PCB violations, and Respondent's degree of culpability, and after consideration of the entire record herein, it is this 24th day of September 1984, ORDERED that Lighthouse Electric Cooperative, Inc., Floydada, Texas, pay a civil penalty in the amount of Four Thousand Dollars (\$4,000) within sixty (60) days of receipt of this ORDER, said penalty to be paid by cashier's check or certified check payable to the United States of America and forwarded to the Regional Hearing Clerk, U.S. Environmental Protection Agency, Region 6, 1201 Elm Street, Interfirst Two Building, Dallas, Texas 75270.

DATE

8/31/1984

Alton Higginbotham
Lighthouse Electric Cooperative, Inc.
Respondent

DATE

9/12/84

Allyn M. Davis
Allyn M. Davis, Director
Air and Waste Management Division

It is so ordered. This ORDER shall become effective immediately.

Dick Whittington
Dick Whittington, P.E.
Regional Administrator

Dated this 21 day of September 1984, at Dallas, Texas.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Consent Agreement and Final Order was placed in the United States Mail, postage prepaid, certified mail, return receipt requested, No. P 455 259 153 on this 24th day of September 1984, addressed to Mr. Harry H. Jung, Jung & Marley, P. O. Box 456, Crosbyton, Texas 79322.


Elizabeth A. Hurst
Attorney at Law



No 97301

LIGHTHOUSE ELECTRIC COOP, INC.
REMITTER

10/9/84

88-835
1113

PAY TO THE
ORDER OF

UNITED STATES OF AMERICA

\$ 4,000.00

1ST NAT'L BANK OF FLOYDADA, TEXAS 4000000000000000

CASHIER'S CHECK

VICE-PRES.

ASS'T CASHIER

Glenda Wilson

EX 408

VI-106C

REGIONAL BANK OF FLOYDADA
EPA REGION VI

OCT 12 12 00 PM '84

FILED

Jim

ENCLOSURE 2

EPA COSTS

F. J. DOYLE SALVAGE SUPERFUND SITE

Reconciliation Pending

Itemized Cost Summary

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

REGIONAL PAYROLL COSTS	\$187,368.71
REGIONAL TRAVEL COSTS	\$1,983.23
EMERGENCY RESPONSE CONTRACTS-SUB (ERC)	
ENVIRONMENTAL RESTORATION, LLC (EPS41604)	\$1,656,453.21
ENFORCEMENT SUPPORT SERVICES (ESS)	
SCIENCE APPLICATIONS INTERNATIONAL CORPORATION (68-W0-0091) ...	\$1,530.29
TECHLAW (68-W4-0016)	\$626.93
ARS ALEUNT REMEDIATION, LLC (EPS51701)	\$43,217.00
TOEROEK ASSOCIATES, INC. (EPW10011)	\$1,466.00
ENVIRONMENTAL SERVICES ASSISTANCE TEAMS (EST)	
ICF TECHNOLOGY, INC. (68-01-7456)	\$306.73
ICF TECHNOLOGY, INC. (68-D1-0135)	\$3,368.01
LOCKHEED MARTIN SERVICES, INC. (68-D6-0005)	\$9,561.93
RECORDS MANAGEMENT/ DOCUMENT CONTROL	
SCIENCE APPLICATION INT'L CORP. (EPR60801)	\$1,640.12
TECHNICAL ASSISTANCE TEAM (TAT) CONTRACT	
ECOLOGY AND ENVIRONMENT, INC. (68-W0-0037)	\$39,288.08
TECHNICAL SERVICES AND SUPPORT	
WESTON SOLUTIONS, INC. (EPS51702)	\$523,514.20
CONTRACT LAB PROGRAM (CLP) COSTS	
FINANCIAL COST SUMMARY	\$29,132.15
MISCELLANEOUS COSTS (MIS)	\$122.00

Reconciliation Pending

Itemized Cost Summary

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D
UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020
DEMAND LETTER

EPA INDIRECT COSTS	\$1,334,115.79
Total Site Costs:	<u>\$3,833,694.38</u>

Reconciliation Pending

Regional Payroll Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Hours</u>	<u>Payroll Costs</u>
BRESCIA, NICOLAS	2019	09	17.00	1,442.29
		10	47.00	3,981.95
			<u>64.00</u>	<u>\$5,424.24</u>
BURLESON, JOHN R.	1996	01	5.50	170.15
			<u>5.50</u>	<u>\$170.15</u>
CLARK, KENNETH	1995	22	27.00	845.34
		27	1.00	33.36
	1996	02	1.00	33.36
			<u>29.00</u>	<u>\$912.06</u>
COMPTON, JOSEPH	1997	23	2.50	81.48
			<u>2.50</u>	<u>\$81.48</u>
COOK, BRENDA	2019	05	7.75	618.19
			<u>7.75</u>	<u>\$618.19</u>
DELGADO, COURTNEY	2018	25	6.00	433.37
		26	27.00	1,950.17
	2019	01	8.00	532.78
		02	15.00	1,083.43
		03	46.00	3,322.50
		04	23.00	1,661.26
		05	57.00	4,117.03
		06	71.00	5,128.20
		07	31.00	2,192.22
		08	36.00	2,580.78
		10	36.00	2,782.91
		11	27.00	2,089.10
		14	8.00	619.49
		15	12.00	929.23
		16	17.00	1,316.42
		17	6.00	464.63
		19	14.00	1,084.10
		21	10.00	774.69
		23	18.75	1,451.93

Reconciliation Pending

Regional Payroll Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Hours</u>	<u>Payroll Costs</u>
DELGADO, COURTNEY	2019	24	17.25	1,335.78
		25	18.50	1,388.88
		26	18.50	1,388.88
	2020	02	9.50	726.11
		03	11.50	879.04
		05	10.00	764.32
			<u>554.00</u>	<u>\$40,997.25</u>
DOUCET, LISA	1991	16	2.00	30.89
FELDMAN, LISA A.	1998	10	1.00	36.84
			<u>3.00</u>	<u>\$67.73</u>
ELFEKY, MAHMOUD	1998	11	6.00	202.59
		12	4.00	135.05
			<u>10.00</u>	<u>\$337.64</u>
ENGBLOM, RITA	1996	01	2.00	46.64
			<u>2.00</u>	<u>\$46.64</u>
EPPLER, DAVID	2018	14	8.00	592.41
		15	10.00	740.50
		16	8.00	593.18
		17	5.00	370.73
		24	8.00	593.18
		25	29.00	2,150.26
		26	48.00	3,559.05
	2019	01	30.50	2,261.49
		02	13.00	963.91
		03	6.00	444.88
		10	4.00	301.16
		12	3.50	264.39
		13	2.00	151.06
		17	8.00	604.83
		18	17.00	1,285.26
		19	12.00	907.23
		20	10.00	756.05
		22	8.00	604.83

Reconciliation Pending

Regional Payroll Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Hours</u>	<u>Payroll Costs</u>
EPPLER, DAVID	2019	24	5.50	415.82
		25	8.00	604.83
		26	3.00	226.81
		27	3.00	226.81
	2020	01	6.00	453.62
		03	3.00	230.59
		04	8.00	614.91
		05	8.00	614.91
		06	5.00	383.01
		08	29.00	2,360.96
		09	0.50	40.71
		12	3.00	244.22
		15	2.50	203.53
		16	8.00	651.31
		18	13.00	1,058.36
		19	18.00	1,465.41
		20	10.00	814.12
		21	16.50	1,345.04
		22	21.00	1,709.66
		23	8.00	651.31
			409.00	\$31,460.34
FIFE, GREGORY	2017	20	4.00	299.01
			4.00	\$299.01
FISHER, KELSEY	2019	06	18.00	630.62
		07	3.50	108.51
		10	9.00	320.47
			30.50	\$1,059.60
FLORES, RAYMOND	1998	09	6.00	220.14
			6.00	\$220.14
FOSTER, ALTHEA	1999	15	6.50	271.69
		16	14.00	585.10
		17	6.00	233.64
		18	1.00	41.79

Reconciliation Pending

Regional Payroll Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Hours</u>	<u>Payroll Costs</u>
FOSTER, ALTHEA	1999	22	1.00	41.79
			28.50	\$1,174.01
GOROSTIZA, SYLVIA	1995	22	11.00	209.90
	1998	08	2.00	59.83
			13.00	\$269.73
HUMPHREY, MARVELYN	1998	11	2.00	72.67
		12	3.00	109.00
		13	4.00	145.33
			9.00	\$327.00
JOHNSON, COURTNEY A.	1995	24	1.50	51.70
	1996	01	3.00	103.43
		02	0.25	8.62
			4.75	\$163.75
LOESEL, MATTHEW	2019	07	3.50	319.63
			3.50	\$319.63
MARTIN, JOHN	2019	04	17.25	1,344.37
		06	8.00	635.14
		08	1.00	77.29
			26.25	\$2,056.80
MCMILLIN, RICHARD	1995	22	10.00	341.63
			10.00	\$341.63
MINER, L	1991	16	4.00	79.54
		17	16.00	318.14
		18	4.00	79.54
	1995	22	32.00	837.53
			56.00	\$1,314.75
MOORE, GARY	2017	23	10.00	758.67
		24	3.50	254.16
	2018	08	4.00	326.96
		09	1.00	81.74

Reconciliation Pending

Regional Payroll Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Hours</u>	<u>Payroll Costs</u>
MOORE, GARY	2018	10	21.00	1,716.60
		12	8.00	653.98
		13	17.00	1,389.61
		15	9.00	735.67
		16	40.00	3,269.69
		17	3.00	245.23
		19	2.00	163.48
		22	15.00	1,226.15
		23	24.00	1,961.87
		24	32.00	2,615.76
		25	9.00	735.68
		26	50.50	4,127.99
	2019	01	26.00	1,979.43
		02	5.00	408.70
		03	40.00	3,270.24
		04	24.00	1,957.54
		05	56.00	4,365.76
		06	51.50	3,572.55
		08	40.00	3,162.83
		09	54.00	4,598.66
		10	7.00	595.38
		11	32.00	2,725.13
		12	43.00	3,814.10
		13	28.00	2,483.62
		16	11.00	976.88
		17	2.00	177.54
		18	1.00	88.77
		19	10.50	932.06
		23	7.00	621.38
		26	6.00	532.61
	2020	10	2.00	186.46
		11	3.50	326.35
		12	1.50	139.87
		13	19.00	1,771.64
		15	11.50	1,072.32
		16	0.50	46.64

Reconciliation Pending

Regional Payroll Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Hours</u>	<u>Payroll Costs</u>
MOORE, GARY	2020	17	17.50	1,631.76
		18	8.50	792.59
		19	15.00	1,398.67
		20	11.50	1,072.30
		21	4.50	419.95
		22	1.00	93.23
		23	6.00	559.47
			<u>795.00</u>	<u>\$66,037.67</u>
PATEL, ANISH	2019	06	24.00	834.83
		07	3.50	108.51
			<u>27.50</u>	<u>\$943.34</u>
PETERSEN, JAY	2019	03	4.00	322.30
		04	7.00	564.02
		05	5.00	402.88
		06	10.00	805.92
		10	8.00	656.66
		11	6.00	492.76
		12	1.00	82.13
		13	0.50	41.06
		18	2.00	164.26
			<u>46.00</u>	<u>\$3,743.81</u>
RITTER, MELVIN	1991	16	5.00	132.93
		17	7.00	186.09
			<u>12.00</u>	<u>\$319.02</u>
ROBERTSON, DAVID	2019	06	9.00	680.53
		10	9.00	760.66
			<u>18.00</u>	<u>\$1,441.19</u>
SCHILLING, LEONARD	2018	24	5.00	454.14
		25	9.00	817.45
		26	3.50	317.90
	2019	01	3.00	272.48

Reconciliation Pending

Regional Payroll Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Hours</u>	<u>Payroll Costs</u>
SCHILLING, LEONARD	2019	02	19.50	1,771.09
		03	7.00	622.01
		04	14.00	1,217.95
		05	19.00	1,652.90
		10	4.00	369.56
		11	3.00	277.66
		12	6.00	555.32
		13	3.00	277.66
		14	1.00	92.63
		15	3.50	324.18
		17	4.00	370.50
		18	3.00	277.87
		19	2.00	185.26
		20	5.00	463.12
		21	1.00	92.75
		22	4.00	370.50
		25	1.00	92.62
		26	1.00	92.63
	2020	08	2.00	194.62
		09	8.00	778.48
		10	11.00	1,096.64
		11	14.00	1,395.72
		12	14.00	1,395.71
SCHUPPENER, BARBARA PATTERSON, BARBARA J.	1998	14	2.00	199.39
		15	10.00	996.96
		16	3.00	299.08
		19	3.00	299.07
		20	5.00	498.47
			<u>193.50</u>	<u>\$18,122.32</u>
			<u>6.00</u>	<u>\$190.99</u>
SPENCER, KELVIN	2019	02	1.00	64.87

Reconciliation Pending

Regional Payroll Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Hours</u>	<u>Payroll Costs</u>
SPENCER, KELVIN	2019	03	2.00	129.74
			3.00	\$194.61
STEVENS, KENNETH	1995	22	66.00	1,522.63
	1998	09	27.00	827.39
			93.00	\$2,350.02
STRECK, LARRY	1991	16	9.00	213.94
		17	11.00	269.51
			20.00	\$483.45
SULLIVAN, ROBERT	1991	02	34.00	669.73
		14	8.00	170.71
		15	8.00	170.71
		17	8.00	170.71
		18	4.00	85.35
		21	24.00	556.44
			86.00	\$1,823.65
THEIRL, LISA	1995	22	2.00	63.26
		23	3.25	102.80
		24	7.00	221.38
		25	5.75	181.86
		26	1.25	39.54
		27	0.50	15.81
			19.75	\$624.65
TURNER, JAMES	1997	22	0.50	21.98
			0.50	\$21.98
TURNER, PHILIP	2018	24	2.00	140.53
		25	1.50	105.41
	2019	02	4.25	298.65
			7.75	\$544.59
WARREN, ELIZABETH	1998	08	1.00	29.20

Reconciliation Pending

Regional Payroll Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Hours</u>	<u>Payroll Costs</u>
MACDOWELL, ELIZABETH	1998	10	2.00	58.42
			3.00	\$87.62
WEBSTER, SUSAN	2019	06	6.00	513.14
		10	4.00	365.04
		11	3.00	274.13
		13	1.50	137.08
		18	10.00	963.74
			24.50	\$2,253.13
WOOL, LISA	1995	22	27.00	524.90
HURST, LISA D.			27.00	\$524.90
Total Regional Payroll Costs			2,660.75	\$187,368.71

Reconciliation Pending

Headquarters Payroll Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020
DEMAND LETTER

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Hours</u>	<u>Payroll Costs</u>
----------------------	------------------------	-----------------------	--------------------------	--------------------------

Reconciliation Pending

Regional Travel Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

<u>Traveler/Vendor Name</u>	<u>Travel Number</u>	<u>Treasury Schedule</u>	<u>Treasury Schedule Date</u>	<u>Travel Costs</u>
*** Employee Name Not Found ***	T0468291	SV025	03/11/1991	53.56
				<hr/> \$53.56
CLARK, KENNETH	T4029375	000A95209	08/01/1995	32.10
				<hr/> \$32.10
COOK, BRENDA	TAA06NPT	AMP190052	12/07/2018	31.59
	TAA06NPT	AVC190070	12/07/2018	24.00
	TAA06NPT	AVC190126	02/15/2019	14.75
				<hr/> \$70.34
DELGADO, COURTNEY	TAA06GAO	AVC190017	10/09/2018	14.75
	TAA06GAO	AMP190010	10/09/2018	73.13
	TAA06KP8	AMP190034	11/09/2018	65.40
	TAA06KP8	AVC190045	11/09/2018	14.75
				<hr/> \$168.03
FOSTER, ALTHEA	T6636369	ACHA99133	05/17/1999	15.50
				<hr/> \$15.50
MARTIN, JOHN	TAA06NKL	AVC190061	11/28/2018	6.80
	TAA06NKL	AMP190045	11/28/2018	43.60
	TAA06NZR	AMP190050	12/04/2018	43.60
	TAA06NZR	AVC190068	12/04/2018	6.80
	TAA06RMU	AVC190117	02/11/2019	6.80
	TAA06RN3	AVC190117	02/11/2019	6.80
	TAA06RN3	AMP190078	02/11/2019	46.40
	TAA06RMU	AMP190078	02/11/2019	46.40
				<hr/> \$207.20

Reconciliation Pending

Regional Travel Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

<u>Traveler/Vendor Name</u>	<u>Travel Number</u>	<u>Treasury Schedule</u>	<u>Treasury Schedule Date</u>	<u>Travel Costs</u>
MOORE, GARY	TAA06HEL	AVC190012	10/04/2018	6.80
	TAA06HEL	AMP190009	10/05/2018	170.59
	TAA06IFB	AMP190014	10/15/2018	101.38
	TAA06IFB	AVC190021	10/15/2018	6.80
	TAA06UWA	AMP190099	03/12/2019	157.18
	TAA06UWA	AVC190147	03/12/2019	6.80
	TAA06X3L	AVC190159	03/25/2019	6.80
	TAA06X3L	AMP190108	03/25/2019	316.10
	TAA06ZJQ	AMP190122	04/12/2019	157.18
	TAA06ZJQ	AVC190173	04/12/2019	6.80
	TAA07977	AVC190216	06/12/2019	6.80
	TAA07977	AMP190164	06/12/2019	103.82
	TAA07L0B	AVC190276	08/29/2019	6.80
	TAA07L0B	AMP190220	08/29/2019	52.78
				<hr/> \$1,106.63
ROBERTSON, DAVID	TAA06SUX	AVC190137	02/28/2019	108.75
	TAA06SUX	AMP190091	02/28/2019	221.12
				<hr/> \$329.87
Total Regional Travel Costs				<hr/> <hr/> \$1,983.23

Reconciliation Pending

Headquarters Travel Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020
DEMAND LETTER

<u>Traveler/Vendor Name</u>	<u>Travel Number</u>	<u>Treasury Schedule</u>	<u>Treasury Schedule Date</u>	<u>Travel Costs</u>
-----------------------------	--------------------------	------------------------------	---------------------------------------	---------------------

Reconciliation Pending

Contract Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D
 UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020
 DEMAND LETTER

EMERGENCY RESPONSE CONTRACTS-SUB (ERC)

Contractor Name: ENVIRONMENTAL RESTORATION, LLC

EPA Contract Number: EPS41604

Delivery Order Information DO # Start Date End Date
 68HE0618F0308 09/21/2018
 08/28/2019

Project Officer(s): LABOMBARD, WILLIAM

Dates of Service: From: 09/21/2018 To: 08/28/2019

Summary of Service: EMERGENCY RESPONSE CONTRACTS-SUB(OSCM)

Total Costs: \$1,656,453.21

Voucher Number	Voucher Date	Voucher Amount	Treasury Schedule Number and Date	Site Amount	Annual Allocation
60308-01	12/12/2018	112,927.61	AVC190092 01/22/2019	112,927.61	4,067.77
60308-02	01/10/2019	204,578.24	AVC190094 01/28/2019	204,578.24	7,369.11
60308-03	02/20/2019	603,160.27	AVC190141 03/06/2019	603,160.27	21,726.44
60308-04	03/27/2019	578,189.57	AVC190179 04/22/2019	578,189.57	20,826.97
60308-05	04/30/2019	79,419.09	AVC190200 05/20/2019	79,419.09	2,860.76
60308-06	06/04/2019	14,771.28	AVC190223 06/21/2019	14,771.28	532.08
60308-07	10/08/2019	5,724.17	AVC200020 10/21/2019	5,724.17	206.19
60308-08	11/08/2019	90.40	AVC200049 11/21/2019	90.40	3.26
Total:				\$1,598,860.63	\$57,592.58

Reconciliation Pending

Contract Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D
UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020
DEMAND LETTER

EMERGENCY RESPONSE CONTRACTS-SUB (ERC)

Contractor Name: ENVIRONMENTAL RESTORATION, LLC

EPA Contract Number: EPS41604

Delivery Order Information DO # Start Date End Date
68HE0618F0308 09/21/2018
08/28/2019

Project Officer(s): LABOMBARD, WILLIAM

Dates of Service: From: 09/21/2018 To: 08/28/2019

Summary of Service: EMERGENCY RESPONSE CONTRACTS-SUB(OSCM)

Total Costs: \$1,656,453.21

Voucher Number	Schedule Number	Date Type	Annual Allocation Rate
60308-01	AVC190092	Class	0.036021
60308-02	AVC190094	Class	0.036021
60308-03	AVC190141	Class	0.036021
60308-04	AVC190179	Class	0.036021
60308-05	AVC190200	Class	0.036021
60308-06	AVC190223	Class	0.036021
60308-07	AVC200020	Class	0.036021
60308-08	AVC200049	Class	0.036021

Reconciliation Pending

Contract Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D
 UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020
 DEMAND LETTER

ENFORCEMENT SUPPORT SERVICES (ESS)

Contractor Name: SCIENCE APPLICATIONS INTERNATIONAL CORPORATION

EPA Contract Number: 68-W0-0091

Delivery Order Information DO # Start Date End Date
 6011 03/02/2002 08/16/2002

Project Officer(s): HARTIS, KAREN

Dates of Service: From: 03/02/2002 To: 08/16/2002

Summary of Service:

Total Costs: \$1,530.29

<u>Voucher Number</u>	<u>Voucher Date</u>	<u>Voucher Amount</u>	<u>Treasury Schedule Number and Date</u>	<u>Site Amount</u>	<u>Annual Allocation</u>
1260-11	04/12/2002	74,424.24	R2424 05/10/2002	552.06	127.61
1260-13	06/07/2002	84,092.76	R2529 07/03/2002	6.96	1.61
1260-12	06/21/2002	80,311.28	R2557 07/17/2002	420.07	97.10
1260-14	07/03/2002	56,676.83	R2582 08/01/2002	85.55	19.77
1260-15	08/02/2002	45,086.18	R2627 08/28/2002	142.11	32.85
1260-16	08/29/2002	45,111.00	R2683 09/26/2002	36.23	8.37
Total:				<u>\$1,242.98</u>	<u>\$287.31</u>

Reconciliation Pending

Contract Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D
UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020
DEMAND LETTER

ENFORCEMENT SUPPORT SERVICES (ESS)

Contractor Name: SCIENCE APPLICATIONS INTERNATIONAL CORPORATION

EPA Contract Number: 68-W0-0091

Delivery Order Information DO # Start Date End Date
6011 03/02/2002 08/16/2002

Project Officer(s): HARTIS, KAREN

Dates of Service: From: 03/02/2002 To: 08/16/2002

Summary of Service:

Total Costs: \$1,530.29

<u>Voucher Number</u>	<u>Schedule Number</u>	<u>Rate Type</u>	<u>Annual Allocation Rate</u>
1260-11	R2424	Final	0.231150
1260-13	R2529	Final	0.231150
1260-12	R2557	Final	0.231150
1260-14	R2582	Final	0.231150
1260-15	R2627	Final	0.231150
1260-16	R2683	Final	0.231150

Reconciliation Pending

Contract Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D
UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020
DEMAND LETTER

ENFORCEMENT SUPPORT SERVICES (ESS)

Contractor Name: TECHLAW

EPA Contract Number: 68-W4-0016

Project Officer(s): CHAMBERS, CARLENE
HARTIS, KAREN

Dates of Service: From: 07/26/1997 To: 12/25/1998

Summary of Service: ENFORCEMENT SUPPORT SERVICES

Total Costs: \$626.93

<u>Voucher Number</u>	<u>Voucher Date</u>	<u>Voucher Amount</u>	<u>Treasury Schedule Number and Date</u>	<u>Site Amount</u>	<u>Annual Allocation</u>
38	09/15/1997	609,745.94	R8023 10/10/1997	171.99	92.46
53	12/15/1998	658,389.43	R9278 01/19/1999	147.10	94.01
54	01/15/1999	561,743.77	R9354 02/23/1999	67.47	53.90
Total:				<u>\$386.56</u>	<u>\$240.37</u>

Reconciliation Pending

Contract Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D
UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020
DEMAND LETTER

ENFORCEMENT SUPPORT SERVICES (ESS)

Contractor Name: TECHLAW
EPA Contract Number: 68-W4-0016
Project Officer(s): CHAMBERS, CARLENE
HARTIS, KAREN
Dates of Service: From: 07/26/1997 To: 12/25/1998
Summary of Service: ENFORCEMENT SUPPORT SERVICES
Total Costs: \$626.93

<u>Voucher Number</u>	<u>Schedule Number</u>	<u>Rate Type</u>	<u>Annual Allocation Rate</u>
38	R8023	Final	0.537618
53	R9278	Provisional	0.639109
54	R9354	Final	0.798886

Reconciliation Pending

Contract Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D
 UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020
 DEMAND LETTER

ENFORCEMENT SUPPORT SERVICES (ESS)

Contractor Name: ARS ALEUNT REMEDIATION, LLC

EPA Contract Number: EPS51701

Delivery Order Information	DO #	Start Date	End Date
	00001	08/26/2018	06/28/2020
	00005	08/26/2018	03/01/2020

Project Officer(s): COLLINS, LA'MONICA
PEARSON, KELLON

Dates of Service: From: 08/26/2018 To: 06/28/2020

Summary of Service: ENFORCEMENT SUPPORT SERVICES

Total Costs: \$43,217.00

Voucher Number	Voucher Date	Voucher Amount	Treasury Schedule Number and Date	Site Amount	Annual Allocation
20	10/20/2018	107,979.87	AVC190042 11/06/2018	42.75	14.62
20	10/22/2018	13,016.42	AVC190042 11/06/2018	604.26	206.69
22	12/20/2018	6,668.84	AVC190106 02/04/2019	1,183.21	404.71
23	02/05/2019	107,979.87	AVC190128 02/19/2019	17.83	6.10
23	02/05/2019	7,503.63	AVC190128 02/19/2019	12.66	4.33
24	03/11/2019	53,989.93	AVC190162 03/28/2019	8.92	3.05
25	03/25/2019	55,609.68	AVC190171 04/10/2019	18.36	6.28
26	04/19/2019	111,219.35	AVC190189 05/06/2019	437.61	149.68
27	05/20/2019	111,219.35	AVC190210 06/04/2019	437.61	149.68
28	06/20/2019	11,065.18	AVC190231 07/02/2019	248.88	85.13
28	06/20/2019	111,219.35	AVC190231 07/02/2019	2,141.58	732.52
29	07/20/2019	8,539.16	AVC190257 08/02/2019	466.50	159.56
29	07/20/2019	111,219.35	AVC190257 08/02/2019	1,408.41	481.74
30	08/20/2019	111,219.35	AVC190285 09/09/2019	17,126.87	5,858.19
31	09/20/2019	111,219.35	AVC200007 10/07/2019	4,789.92	1,638.38
32	10/20/2019	111,219.35	AVC200030 11/01/2019	84.40	28.87
00033	11/21/2019	111,219.35	AVC200072 12/12/2019	36.73	12.56
34	12/20/2019	111,219.35	AVC200093 01/09/2020	172.45	58.99
00035	01/22/2020	111,219.35	AVC200129 02/10/2020	592.85	202.78
EPS51701_36_00	02/20/2020	6,700.35	AVC200156 03/13/2020	1,612.38	551.51
EPS51701_37_00	03/09/2020	55,609.67	AVC200176 03/27/2020	91.06	31.15
EPS51701_38_00	03/19/2020	57,279.89	AVC200186 04/02/2020	50.92	17.42
EPS51701_38_00	03/19/2020	2,989.54	AVC200186 04/02/2020	5.37	1.84
EPS51701_39_00	04/20/2020	114,559.77	AVC200228 05/11/2020	352.50	120.57

Reconciliation Pending

Contract Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D
UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020
DEMAND LETTER

ENFORCEMENT SUPPORT SERVICES (ESS)

Contractor Name: ARS ALEUNT REMEDIATION, LLC

EPA Contract Number: EPS51701

Delivery Order Information	<u>DO #</u>	<u>Start Date</u>	<u>End Date</u>
	00001	08/26/2018	06/28/2020
	00005	08/26/2018	03/01/2020

Project Officer(s): COLLINS, LA'MONICA
PEARSON, KELLON

Dates of Service: From: 08/26/2018 To: 06/28/2020

Summary of Service: ENFORCEMENT SUPPORT SERVICES

Total Costs: \$43,217.00

<u>Voucher Number</u>	<u>Voucher Date</u>	<u>Voucher Amount</u>	<u>Treasury Schedule Number</u>	<u>Schedule Date</u>	<u>Site Amount</u>	<u>Annual Allocation</u>
EPS51701_40_00	05/22/2020	114,559.77	AVC200248	06/04/2020	250.74	85.76
EPS51701_42_00	07/22/2020	114,559.77	AVC200319	08/13/2020	7.54	2.58
Total:					<u>\$32,202.31</u>	<u>\$11,014.69</u>

Reconciliation Pending

Contract Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D
 UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020
 DEMAND LETTER

ENFORCEMENT SUPPORT SERVICES (ESS)

Contractor Name: ARS ALEUNT REMEDIATION, LLC
 EPA Contract Number: EPS51701
 Delivery Order Information DO # Start Date End Date
 00001 08/26/2018 06/28/2020
 00005 08/26/2018 03/01/2020
 Project Officer(s): COLLINS, LA'MONICA
 PEARSON, KELLON
 Dates of Service: From: 08/26/2018 To: 06/28/2020
 Summary of Service: ENFORCEMENT SUPPORT SERVICES
 Total Costs: \$43,217.00

<u>Voucher Number</u>	<u>Schedule Number</u>	<u>Rate Type</u>	<u>Annual Allocation Rate</u>
20	AVC190042	Class	0.342047
20	AVC190042	Class	0.342047
22	AVC190106	Class	0.342047
23	AVC190128	Class	0.342047
24	AVC190162	Class	0.342047
25	AVC190171	Class	0.342047
26	AVC190189	Class	0.342047
27	AVC190210	Class	0.342047
28	AVC190231	Class	0.342047
29	AVC190257	Class	0.342047
30	AVC190285	Class	0.342047
31	AVC200007	Class	0.342047
32	AVC200030	Class	0.342047
00033	AVC200072	Class	0.342047
34	AVC200093	Class	0.342047
00035	AVC200129	Class	0.342047
EPS51701_36_00005	AVC200156	Class	0.342047
EPS51701_37_00001	AVC200176	Class	0.342047
EPS51701_38_00001	AVC200186	Class	0.342047
EPS51701_38_00005	AVC200186	Class	0.342047
EPS51701_39_00001	AVC200228	Class	0.342047
EPS51701_40_00001	AVC200248	Class	0.342047
EPS51701_42_00001	AVC200319	Class	0.342047

Reconciliation Pending

Contract Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D
UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020
DEMAND LETTER

ENFORCEMENT SUPPORT SERVICES (ESS)

Contractor Name: TOEROEK ASSOCIATES, INC.

EPA Contract Number: EPW10011

Delivery Order Information DO # Start Date End Date
00002 02/23/2014 05/24/2014

Project Officer(s): LABOMBARD, WILLIAM

Dates of Service: From: 02/23/2014 To: 05/24/2014

Summary of Service: ENFORCEMENT SUPPORT SERVICES

Total Costs: \$1,466.00

<u>Voucher Number</u>	<u>Voucher Date</u>	<u>Voucher Amount</u>	<u>Treasury Schedule Number and Date</u>	<u>Site Amount</u>	<u>Annual Allocation</u>
49	04/15/2014	187,419.40	AVC140157 05/15/2014	305.59	261.84
52	06/16/2014	154,987.42	AVC140199 07/10/2014	483.93	414.64
Total:				<u>\$789.52</u>	<u>\$676.48</u>

Reconciliation Pending

Contract Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D
UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020
DEMAND LETTER

ENFORCEMENT SUPPORT SERVICES (ESS)

Contractor Name: TOEROEK ASSOCIATES, INC.
EPA Contract Number: EPW10011
Delivery Order Information DO # Start Date End Date
00002 02/23/2014 05/24/2014
Project Officer(s): LABOMBARD, WILLIAM
Dates of Service: From: 02/23/2014 To: 05/24/2014
Summary of Service: ENFORCEMENT SUPPORT SERVICES
Total Costs: \$1,466.00

<u>Voucher Number</u>	<u>Schedule Number</u>	<u>Rate Type</u>	<u>Annual Allocation Rate</u>
49	AVC140157	Provisional	0.856825
52	AVC140199	Provisional	0.856825

Reconciliation Pending

Contract Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D
UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020
DEMAND LETTER

ENVIRONMENTAL SERVICES ASSISTANCE TEAMS (EST)

Contractor Name: ICF TECHNOLOGY, INC.

EPA Contract Number: 68-01-7456

Project Officer(s): BEASLEY, LYNN
EVANS, RAMONA G.

Dates of Service: From: 09/30/1990 To: 09/29/1991

Summary of Service: ENVIRON SERVICES ASSIST TEAMS(SUB-REDI)

Total Costs: \$306.73

<u>Voucher Number</u>	<u>Voucher Date</u>	<u>Voucher Amount</u>	<u>Treasury Schedule Number and Date</u>	<u>Site Amount</u>	<u>Annual Allocation</u>	
104	12/23/1991	156,550.66	R2256	02/04/1992	3.71	8.20
JVR9401	05/25/1995	0.00	R9401	05/25/1995	106.83	188.88
112	03/29/1996	132,470.67	R7150	11/22/1996	-0.32	-0.57
Total:				\$110.22	\$196.51	

Reconciliation Pending

Contract Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D
UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020
DEMAND LETTER

ENVIRONMENTAL SERVICES ASSISTANCE TEAMS (EST)

Contractor Name: ICF TECHNOLOGY, INC.
EPA Contract Number: 68-01-7456
Project Officer(s): BEASLEY, LYNN
EVANS, RAMONA G.
Dates of Service: From: 09/30/1990 To: 09/29/1991
Summary of Service: ENVIRON SERVICES ASSIST TEAMS(SUB-REDI)
Total Costs: \$306.73

<u>Voucher Number</u>	<u>Schedule Number</u>	<u>Rate Type</u>	<u>Annual Allocation Rate</u>
104	R2256	Final	2.211316
JVR9401	R9401	Provisional	1.768027
112	R7150	Provisional	1.768027

Reconciliation Pending

Contract Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D
UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020
DEMAND LETTER

ENVIRONMENTAL SERVICES ASSISTANCE TEAMS (EST)

Contractor Name: ICF TECHNOLOGY, INC.

EPA Contract Number: 68-D1-0135

Project Officer(s): BROSANAN, EDWARD
RILEY, JOHN

Dates of Service: From: 10/01/1994 To: 09/30/1995

Summary of Service: ENVIRON SERVICES ASSIST TEAMS(SUB-REDI)

Total Costs: \$3,368.01

<u>Voucher Number</u>	<u>Voucher Date</u>	<u>Voucher Amount</u>	<u>Treasury Schedule Number and Date</u>	<u>Site Amount</u>	<u>Annual Allocation</u>
108	09/05/1995	577,918.11	R6016 10/10/1995	1,307.37	2,077.49
132	11/20/1996	274,813.15	R7231 12/26/1996	-6.51	-10.34
Total:				<u>\$1,300.86</u>	<u>\$2,067.15</u>

Reconciliation Pending

Contract Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D
UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020
DEMAND LETTER

ENVIRONMENTAL SERVICES ASSISTANCE TEAMS (EST)

Contractor Name: ICF TECHNOLOGY, INC.
EPA Contract Number: 68-D1-0135
Project Officer(s): BROSAN, EDWARD
RILEY, JOHN
Dates of Service: From: 10/01/1994 To: 09/30/1995
Summary of Service: ENVIRON SERVICES ASSIST TEAMS(SUB-REDI)
Total Costs: \$3,368.01

<u>Voucher Number</u>	<u>Schedule Number</u>	<u>Rate Type</u>	<u>Annual Allocation Rate</u>
108	R6016	Final	1.589057
132	R7231	Final	1.589057

Reconciliation Pending

Contract Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D
UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020
DEMAND LETTER

ENVIRONMENTAL SERVICES ASSISTANCE TEAMS (EST)

Contractor Name: LOCKHEED MARTIN SERVICES, INC.
EPA Contract Number: 68-D6-0005
Project Officer(s): MCEADDY, MONICA
WALLING, COLLEEN
Dates of Service: From: 04/01/1997 To: 03/31/1998
Summary of Service: ENVIRON SERVICES ASSIST TEAMS(SUB-REDI)
Total Costs: \$9,561.93

<u>Voucher Number</u>	<u>Voucher Date</u>	<u>Voucher Amount</u>	<u>Treasury Schedule Number and Date</u>	<u>Site Amount</u>	<u>Annual Allocation</u>
ESTW0181	02/09/1998	559,755.74	R8433 03/10/1998	234.73	296.71
6132844R1	03/30/1998	534,547.47	R8581 04/29/1998	160.41	202.76
06134026	04/10/1998	616,088.95	R8606 05/08/1998	3,752.03	4,742.72
74	05/09/2001	101,603.84	R1471 06/12/2001	75.44	97.13
Total:				<u>\$4,222.61</u>	<u>\$5,339.32</u>

Reconciliation Pending

Contract Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D
UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020
DEMAND LETTER

ENVIRONMENTAL SERVICES ASSISTANCE TEAMS (EST)

Contractor Name: LOCKHEED MARTIN SERVICES, INC.
EPA Contract Number: 68-D6-0005
Project Officer(s): MCEADDY, MONICA
WALLING, COLLEEN
Dates of Service: From: 04/01/1997 To: 03/31/1998
Summary of Service: ENVIRON SERVICES ASSIST TEAMS(SUB-REDI)
Total Costs: \$9,561.93

<u>Voucher Number</u>	<u>Schedule Number</u>	<u>Rate Type</u>	<u>Annual Allocation Rate</u>
ESTW0181	R8433	Final	1.264042
6132844R1	R8581	Final	1.264042
06134026	R8606	Final	1.264042
74	R1471	Provisional	1.287510

Reconciliation Pending

Contract Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020
DEMAND LETTERRECORDS MANAGEMENT/ DOCUMENT CONTROL

Contractor Name: SCIENCE APPLICATION INT'L CORP.
EPA Contract Number: EPR60801
Project Officer(s): HARTIS, KAREN
Dates of Service: From: 12/01/2009 To: 03/30/2010
Summary of Service: RECORDS MANAGEMENT, DOCUMENT CONTROL
Total Costs: \$1,640.12

<u>Voucher Number</u>	<u>Voucher Date</u>	<u>Voucher Amount</u>	<u>Treasury Schedule Number and Date</u>	<u>Site Amount</u>
8-10267-21	01/05/2010	82,935.90	R0375 02/04/2010	7.25
770626	03/17/2010	68,337.48	R0605 04/21/2010	796.67
811373	04/14/2010	3,980.21	R0673 05/12/2010	836.20
			Total:	<u><u>\$1,640.12</u></u>

Reconciliation Pending

Contract Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D
 UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020
 DEMAND LETTER

TECHNICAL ASSISTANCE TEAM (TAT) CONTRACT

Contractor Name: ECOLOGY AND ENVIRONMENT, INC.

EPA Contract Number: 68-W0-0037

Project Officer(s): HAWKINS, PATRICIA
TOMIMATSU, KAREN

Dates of Service: From: 10/01/1990 To: 09/30/1995

Summary of Service: TECH ASSIST TEAMS EMERG RESPON-SUB(REDI)

Total Costs: \$39,288.08

Voucher Number	Voucher Date	Voucher Amount	Treasury Schedule Number and Date	Site Amount	Annual Allocation
23	07/07/1992	155,844.30	R2741 08/21/1992	-149.86	-129.79
JV44159	08/31/1994	0.00	44159 08/31/1994	4,033.39	2,146.59
JV44172	08/31/1994	0.00	44172 08/31/1994	951.13	506.20
JV44174	08/31/1994	0.00	44174 08/31/1994	1,028.84	547.55
JV44176	08/31/1994	0.00	44176 08/31/1994	947.99	504.52
JV44177	08/31/1994	0.00	44177 08/31/1994	843.79	449.07
JV44228	09/02/1994	0.00	44228 09/02/1994	94.53	50.31
JV44232	09/10/1994	0.00	44232 09/10/1994	608.84	259.22
JV44430	09/17/1994	0.00	44430 09/17/1994	654.47	278.65
JV44431	09/17/1994	0.00	44431 09/17/1994	-15.69	-6.68
JV44434	09/17/1994	0.00	44434 09/17/1994	6,992.50	2,977.15
JV44301	09/21/1994	0.00	44301 09/21/1994	1,024.91	545.46
84	08/24/1995	3,248,493.75	R6001 10/03/1995	5,780.17	3,076.23
86	09/18/1995	2,821,429.97	R6056 10/24/1995	2,323.79	1,236.73
87	10/18/1995	2,508,147.75	R6108 11/15/1995	867.29	461.58
90	11/15/1995	1,441,864.05	R6175 12/12/1995	26.44	14.07
96	02/21/1996	10,875.45	R6411 03/21/1996	-36.79	-19.58
101R	04/15/1996	870,746.63	R6770 08/13/1996	301.89	160.67
111	08/16/1996	-23,125.81	R7120 11/13/1996	-31.00	-16.50
Total:				\$26,246.63	\$13,041.45

Reconciliation Pending

Contract Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D
 UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020
 DEMAND LETTER

TECHNICAL ASSISTANCE TEAM (TAT) CONTRACT

Contractor Name: ECOLOGY AND ENVIRONMENT, INC.
 EPA Contract Number: 68-W0-0037
 Project Officer(s): HAWKINS, PATRICIA
 TOMIMATSU, KAREN
 Dates of Service: From: 10/01/1990 To: 09/30/1995
 Summary of Service: TECH ASSIST TEAMS EMERG RESPON-SUB(REDI)
 Total Costs: \$39,288.08

<u>Voucher Number</u>	<u>Schedule Number</u>	<u>Rate Type</u>	<u>Annual Allocation Rate</u>
23	R2741	Final	0.866092
JV44159	44159	Final	0.532204
JV44172	44172	Final	0.532204
JV44174	44174	Final	0.532204
JV44176	44176	Final	0.532204
JV44177	44177	Final	0.532204
JV44228	44228	Final	0.532204
JV44232	44232	Provisional	0.425763
JV44430	44430	Provisional	0.425763
JV44431	44431	Provisional	0.425763
JV44434	44434	Provisional	0.425763
JV44301	44301	Final	0.532204
84	R6001	Final	0.532204
86	R6056	Final	0.532204
87	R6108	Final	0.532204
90	R6175	Final	0.532204
96	R6411	Final	0.532204
101R	R6770	Final	0.532204
111	R7120	Final	0.532204

Reconciliation Pending

Contract Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

TECHNICAL SERVICES AND SUPPORT

Contractor Name: WESTON SOLUTIONS, INC.

EPA Contract Number: EPS51702

Delivery Order Information	<u>DO #</u>	<u>Start Date</u>	<u>End Date</u>
	00001	08/07/2017	06/26/2020

Project Officer(s): LABOMBARD, WILLIAM

Dates of Service: From: 08/07/2017 To: 06/26/2020

Summary of Service: TECHNICAL SERVICES AND SUPPORT

Total Costs: \$523,514.20

Voucher Number	Voucher Date	Voucher Amount	Treasury Schedule Number and Date		Site Amount
1-01	10/20/2017	477,814.15	AVC180038	11/15/2017	2,979.96
1-02	11/20/2017	361,900.03	AVC180063	12/12/2017	2,458.27
1-04	01/19/2018	354,562.48	AVC180123	02/13/2018	122.14
1-05	02/19/2018	323,914.18	AVC180147	03/14/2018	2,081.94
1-06	03/15/2018	364,169.58	AVC180170	04/09/2018	5,663.48
1-07	04/18/2018	599,347.44	AVC180207	05/09/2018	5,692.10
1-08	05/17/2018	543,013.74	AVC180228	06/06/2018	16,407.93
1-09	06/19/2018	640,321.89	AVC180252	07/11/2018	88,970.75
1-10	07/18/2018	799,333.50	AVC180273	08/08/2018	64,173.52
1-11	08/16/2018	594,652.99	AVC180328	09/28/2018	16,974.29
1-12	09/14/2018	573,292.54	AVC180328	09/28/2018	1,388.88
1-13	10/19/2018	582,784.99	AVC190049	11/15/2018	5,550.41
1-14R	11/13/2018	599,712.85	AVC190071	12/10/2018	16,354.29
1-15	12/14/2018	549,714.85	AVC190094	01/28/2019	34,758.09
1-16	01/17/2019	538,709.82	AVC190117	02/11/2019	57,625.97
1-17	02/15/2019	216,792.58	AVC190141	03/06/2019	36,434.20
1-18	03/18/2019	314,407.24	AVC190167	04/04/2019	64,220.08
1-19	04/19/2019	606,619.77	AVC190191	05/08/2019	30,565.43
1-20	05/16/2019	1,110,194.27	AVC190211	06/05/2019	8,158.59
1-21	06/18/2019	685,324.99	AVC190230	07/01/2019	6,966.18
1-22	07/19/2019	731,201.79	AVC190263	08/12/2019	8,376.68
1-23	08/20/2019	499,747.79	AVC190287	09/11/2019	990.16
1-24	09/18/2019	427,218.58	AVC200001	10/01/2019	748.97
1-25	10/18/2019	520,577.93	AVC200034	11/07/2019	89.95
0001-32	04/16/2020	560,514.70	AVC200224	05/06/2020	345.89
0001-33	05/14/2020	348,529.77	AVC200247	06/03/2020	8,220.85
0001-34	06/10/2020	269,852.17	AVC200282	07/01/2020	12,080.66

Reconciliation Pending

Contract Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020
DEMAND LETTERTECHNICAL SERVICES AND SUPPORT

Contractor Name: WESTON SOLUTIONS, INC.
EPA Contract Number: EPS51702
Delivery Order Information DO # Start Date End Date
00001 08/07/2017 06/26/2020
Project Officer(s): LABOMBARD, WILLIAM
Dates of Service: From: 08/07/2017 To: 06/26/2020
Summary of Service: TECHNICAL SERVICES AND SUPPORT
Total Costs: \$523,514.20

<u>Voucher Number</u>	<u>Voucher Date</u>	<u>Voucher Amount</u>	<u>Treasury Schedule Number and Date</u>	<u>Site Amount</u>
0001-35	07/15/2020	347,104.55	AVC200310 08/03/2020	25,114.54
			Total:	<u>\$523,514.20</u>

Reconciliation Pending

Financial Cost Summary for the Contract Lab Program

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020
DEMAND LETTER

CONTRACT LAB PROGRAM (CLP) COSTS

Total Routine Analytical Services (RAS) Costs	\$29,132.15
Total Financial Cost Summary	<u>\$29,132.15</u>

Reconciliation Pending

Financial Cost Summary for the Contract Lab Program

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

CONTRACT LAB PROGRAM (CLP) COSTSRoutine Analytical Services (RAS)

Total Costs: \$29,132.15

<u>Voucher Number</u>	<u>Voucher Date</u>	<u>Voucher Amount</u>	<u>Treasury Schedule Number and Date</u>	<u>Site Amount</u>	<u>SMO Amount</u>
Case Number: _____					
EPA Contract Number: 68-D4-0104, DYNCORP					
1-12	03/13/1998	502,084.67	R8524 04/08/1998	303.25	173.24
1-13	04/10/1998	532,806.37	R8610 05/11/1998	524.10	299.40
1-14	05/13/1998	597,786.39	R8704 06/12/1998	46.35	26.48
1-34R2	03/20/2002	750,752.28	R2377 04/15/2002	42.73	24.91
Totals for 68-D4-0104:				\$916.43	\$524.03
Totals for Case Number :				\$916.43	\$524.03
Case Number: 25969					
EPA Contract Number: 68-D5-0005, CLAYTON ENVIRONMENTAL CONSULTANTS					
78465	02/28/1998	6,487.30	R8581 04/29/1998	6,487.30	3,706.02
78472	03/31/1998	9,242.90	R8581 04/29/1998	9,242.90	5,280.22
Totals for 68-D5-0005:				\$15,730.20	\$8,986.24
EPA Contract Number: 68-D5-0141, AMERICAN ANALYTICAL & TECH SERVICES					
T2817	02/26/1998	131.53	R8503 04/01/1998	131.53	75.14
T2820	02/26/1998	1,762.00	R8513 04/06/1998	1,762.00	1,006.58
Totals for 68-D5-0141:				\$1,893.53	\$1,081.72
Totals for Case Number 25969:				\$17,623.73	\$10,067.96
Totals for Routine Analytical Services:				\$18,540.16	\$10,591.99

Reconciliation Pending

Financial Cost Summary for the Contract Lab Program

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020
DEMAND LETTER

CONTRACT LAB PROGRAM (CLP) COSTS

<u>Fiscal</u> <u>Year</u>	<u>Rate Type</u>	<u>SMO</u> <u>Rate</u>
1998	Final	0.571273
2002	Final	0.582867

Reconciliation Pending

Miscellaneous (MIS) Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020
DEMAND LETTER

Miscellaneous (MIS) Costs

Total Costs: \$122.00

<u>Procurement Number</u>	<u>Voucher Number</u>	<u>Voucher Date</u>	<u>Voucher Amount</u>	<u>Treasury Schedule Number and Date</u>	<u>Site Amount</u>	<u>Description</u>
BANKCARD						
B8BK0005463	1760157	04/16/2018	49,030.66	AVC180220 05/24/2018	1.00	FANNIN CO TX CLERK OPI
B8BK0005463	1760158	04/16/2018	49,030.66	AVC180220 05/24/2018	25.00	FANNIN CO TX CLERK OPI
B9BK0006139	1803257	03/20/2019	62,963.56	AVC190182 04/25/2019	96.00	SQ THE LEONARD GRA
Vendor Total:					<u>\$122.00</u>	
Total Miscellaneous Costs:					<u><u>\$122.00</u></u>	

Reconciliation Pending

EPA Indirect Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

<u>Fiscal Year</u>	<u>Direct Costs</u>	<u>Indirect Rate(%)</u>	<u>Indirect Costs</u>
1991	3,187.79	27.36%	872.18
1992	-267.74	27.20%	-72.82
1994	25,422.74	23.05%	5,859.92
1995	5,319.45	20.84%	1,108.57
1996	17,939.55	23.21%	4,163.78
1997	38.22	26.84%	10.26
1998	40,805.77	30.53%	12,458.02
1999	1,551.99	25.69%	398.71
2001	172.57	42.14%	72.72
2002	1,597.93	48.57%	776.11
2010	1,640.12	36.66%	601.27
2014	1,466.00	64.12%	940.00
2017	1,311.84	47.16%	618.66
2018	239,007.95	60.71%	145,101.73
2019	2,064,871.91	53.75%	1,109,868.71
2020	95,512.50	53.75%	51,337.97
	<u>2,499,578.59</u>		

Total EPA Indirect Costs

\$1,334,115.79

Reconciliation Pending

EPA Indirect Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

PAYROLL DIRECT COSTS

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
DOUCET, LISA	1991	16	30.89	27.36%	8.45
			30.89		\$8.45
MINER, L	1991	16	79.54	27.36%	21.76
		17	318.14	27.36%	87.04
		18	79.54	27.36%	21.76
			477.22		\$130.56
RITTER, MELVIN	1991	16	132.93	27.36%	36.37
		17	186.09	27.36%	50.91
			319.02		\$87.28
STRECK, LARRY	1991	16	213.94	27.36%	58.53
		17	269.51	27.36%	73.74
			483.45		\$132.27
SULLIVAN, ROBERT	1991	02	669.73	27.36%	183.24
		14	170.71	27.36%	46.71
		15	170.71	27.36%	46.71
		17	170.71	27.36%	46.71
		18	85.35	27.36%	23.35
		21	556.44	27.36%	152.24
			1,823.65		\$498.96
Total Fiscal Year 1991 Payroll Direct Costs:			3,134.23		\$857.52

Reconciliation Pending

EPA Indirect Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

TRAVEL DIRECT COSTS

Traveler/Vendor Name	Travel Number	Treasury Schedule Date	Travel Costs	Ind. Rate (%)	Indirect Costs
*** Employee Name Not Found ***	T0468291	03/11/1991	53.56	27.36%	14.66
			53.56		\$14.66
Total Fiscal Year 1991 Travel Direct Costs:			53.56		\$14.66
Total Fiscal Year 1991:			3,187.79		\$872.18

OTHER DIRECT COSTS

Contract, IAG, SCA, Misc.NO	Voucher Number	Treasury Schedule Date	Site Amount	Annual/SMO Allocation Costs	Ind. Rate (%)	Indirect Costs
68-01-7456	104	02/04/1992	3.71	8.20	27.20%	3.24
			3.71	8.20		\$3.24
68-W0-0037	23	08/21/1992	-149.86	-129.79	27.20%	-76.06
			-149.86	-129.79		\$-76.06
Total Fiscal Year 1992 Other Direct Costs:			-146.15	-121.59		\$-72.82
Total Fiscal Year 1992:			-267.74			\$-72.82

OTHER DIRECT COSTS

Contract, IAG, SCA, Misc.NO	Voucher Number	Treasury Schedule Date	Site Amount	Annual/SMO Allocation Costs	Ind. Rate (%)	Indirect Costs
68-W0-0037	JV44159	08/31/1994	285.13	151.75	23.05%	100.70
	JV44177	08/31/1994	843.79	449.07	23.05%	298.00
	JV44172	08/31/1994	951.13	506.20	23.05%	335.91
	JV44159	08/31/1994	3,748.26	1,994.84	23.05%	1,323.78

Reconciliation Pending

EPA Indirect Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

OTHER DIRECT COSTS

Contract, IAG, SCA, Misc.NO	Voucher Number	Treasury Schedule Date	Site Amount	Annual/SMO Allocation Costs	Ind. Rate (%)	Indirect Costs
68-W0-0037	JV44174	08/31/1994	1,028.84	547.55	23.05%	363.36
	JV44176	08/31/1994	947.99	504.52	23.05%	334.80
	JV44228	09/02/1994	94.53	50.31	23.05%	33.39
	JV44232	09/10/1994	608.84	259.22	23.05%	200.09
	JV44431	09/17/1994	-15.69	-6.68	23.05%	-5.16
	JV44434	09/17/1994	6,992.50	2,977.15	23.05%	2,298.00
	JV44430	09/17/1994	654.47	278.65	23.05%	215.08
	JV44301	09/21/1994	1,024.91	545.46	23.05%	361.97
			17,164.70	8,258.04		\$5,859.92
Total Fiscal Year 1994 Other Direct Costs:			17,164.70	8,258.04		\$5,859.92
Total Fiscal Year 1994:			25,422.74			\$5,859.92

PAYROLL DIRECT COSTS

Employee Name	Fiscal Year	Pay Period	Payroll Costs	Ind. Rate (%)	Indirect Costs
CLARK, KENNETH	1995	22	845.34	20.84%	176.17
		27	33.36	20.84%	6.95
			878.70		\$183.12
GOROSTIZA, SYLVIA	1995	22	209.90	20.84%	43.74
			209.90		\$43.74
JOHNSON, COURTNEY A.	1995	24	51.70	20.84%	10.77
			51.70		\$10.77

Reconciliation Pending

EPA Indirect Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

PAYROLL DIRECT COSTS

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
MCMILLIN, RICHARD	1995	22	341.63	20.84%	71.20
			341.63		\$71.20
MINER, L	1995	22	837.53	20.84%	174.54
			837.53		\$174.54
STEVENS, KENNETH	1995	22	1,522.63	20.84%	317.32
			1,522.63		\$317.32
THEIRL, LISA	1995	22	63.26	20.84%	13.18
		23	102.80	20.84%	21.42
		24	221.38	20.84%	46.14
		25	181.86	20.84%	37.90
		26	39.54	20.84%	8.24
		27	15.81	20.84%	3.29
			624.65		\$130.17
WOOL, LISA	1995	22	524.90	20.84%	109.39
			524.90		\$109.39
Total Fiscal Year 1995 Payroll Direct Costs:			4,991.64		\$1,040.25

Reconciliation Pending

EPA Indirect Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

TRAVEL DIRECT COSTS

<u>Traveler/Vendor Name</u>	<u>Travel Number</u>	<u>Treasury Schedule Date</u>	<u>Travel Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
CLARK, KENNETH	T4029375	08/01/1995	32.10	20.84%	6.69
			32.10		\$6.69
Total Fiscal Year 1995 Travel Direct Costs:			32.10		\$6.69

OTHER DIRECT COSTS

<u>Contract, IAG, SCA, Misc.NO</u>	<u>Voucher Number</u>	<u>Treasury Schedule Date</u>	<u>Site Amount</u>	<u>Annual/SMO Allocation Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
68-01-7456	JVR9401	05/25/1995	106.83	188.88	20.84%	61.63
			106.83	188.88		\$61.63
Total Fiscal Year 1995 Other Direct Costs:			106.83	188.88		\$61.63
Total Fiscal Year 1995:			5,319.45			\$1,108.57

PAYROLL DIRECT COSTS

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
BURLESON, JOHN R.	1996	01	170.15	23.21%	39.49
			170.15		\$39.49
CLARK, KENNETH	1996	02	33.36	23.21%	7.74
			33.36		\$7.74

Reconciliation Pending

EPA Indirect Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

PAYROLL DIRECT COSTS

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
ENGBLOM, RITA	1996	01	46.64	23.21%	10.83
			46.64		\$10.83
JOHNSON, COURTNEY A.	1996	01	103.43	23.21%	24.01
		02	8.62	23.21%	2.00
			112.05		\$26.01
Total Fiscal Year 1996 Payroll Direct Costs:			362.20		\$84.07

OTHER DIRECT COSTS

<u>Contract, IAG, SCA, Misc.NO</u>	<u>Voucher Number</u>	<u>Treasury Schedule Date</u>	<u>Site Amount</u>	<u>Annual/SMO Allocation Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
68-D1-0135	108	10/10/1995	1,307.37	2,077.49	23.21%	785.63
			1,307.37	2,077.49		\$785.63
68-W0-0037	84	10/03/1995	5,780.17	3,076.23	23.21%	2,055.57
	86	10/24/1995	2,323.79	1,236.73	23.21%	826.40
	87	11/15/1995	867.29	461.58	23.21%	308.43
	90	12/12/1995	26.44	14.07	23.21%	9.40
	96	03/21/1996	-36.79	-19.58	23.21%	-13.08
	101R	08/13/1996	301.89	160.67	23.21%	107.36
			9,262.79	4,929.70		\$3,294.08
Total Fiscal Year 1996 Other Direct Costs:			10,570.16	7,007.19		\$4,079.71
Total Fiscal Year 1996:			17,939.55			\$4,163.78

Reconciliation Pending

EPA Indirect Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

PAYROLL DIRECT COSTS

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
COMPTON, JOSEPH	1997	23	81.48	26.84%	21.87
			81.48		\$21.87
TURNER, JAMES	1997	22	21.98	26.84%	5.90
			21.98		\$5.90
Total Fiscal Year 1997 Payroll Direct Costs:			103.46		\$27.77

OTHER DIRECT COSTS

<u>Contract, IAG, SCA, Misc.NO</u>	<u>Voucher Number</u>	<u>Treasury Schedule Date</u>	<u>Site Amount</u>	<u>Annual/SMO Allocation Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
68-01-7456	112	11/22/1996	-0.32	-0.57	26.84%	-0.24
			-0.32	-0.57		\$-0.24
68-D1-0135	132	12/26/1996	-6.51	-10.34	26.84%	-4.52
			-6.51	-10.34		\$-4.52
68-W0-0037	111	11/13/1996	-31.00	-16.50	26.84%	-12.75
			-31.00	-16.50		\$-12.75
Total Fiscal Year 1997 Other Direct Costs:			-37.83	-27.41		\$-17.51
Total Fiscal Year 1997:				38.22		\$10.26

Reconciliation Pending

EPA Indirect Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

PAYROLL DIRECT COSTS

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
DOUCET, LISA	1998	10	36.84	30.53%	11.25
			36.84		\$11.25
ELFEKY, MAHMOUD	1998	11	202.59	30.53%	61.85
		12	135.05	30.53%	41.23
			337.64		\$103.08
FLORES, RAYMOND	1998	09	220.14	30.53%	67.21
			220.14		\$67.21
GOROSTIZA, SYLVIA	1998	08	59.83	30.53%	18.27
			59.83		\$18.27
HUMPHREY, MARVELYN	1998	11	72.67	30.53%	22.19
		12	109.00	30.53%	33.28
		13	145.33	30.53%	44.37
			327.00		\$99.84
SCHUPPENER, BARBARA	1998	09	190.99	30.53%	58.31
			190.99		\$58.31
STEVENS, KENNETH	1998	09	827.39	30.53%	252.60
			827.39		\$252.60
WARREN, ELIZABETH	1998	08	29.20	30.53%	8.91

Reconciliation Pending

EPA Indirect Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

PAYROLL DIRECT COSTS

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
WARREN, ELIZABETH	1998	10	58.42	30.53%	17.84
			87.62		\$26.75
Total Fiscal Year 1998 Payroll Direct Costs:			2,087.45		\$637.31

OTHER DIRECT COSTS

<u>Contract, IAG, SCA, Misc.NO</u>	<u>Voucher Number</u>	<u>Treasury Schedule Date</u>	<u>Site Amount</u>	<u>Annual/SMO Allocation Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
68-D4-0104	1-12	04/08/1998	303.25	173.24	30.53%	145.47
	1-13	05/11/1998	524.10	299.40	30.53%	251.41
	1-14	06/12/1998	46.35	26.48	30.53%	22.23
			873.70	499.12		\$419.11
68-D5-0005	78472	04/29/1998	9,242.90	5,280.22	30.53%	4,433.91
	78465	04/29/1998	6,487.30	3,706.02	30.53%	3,112.02
			15,730.20	8,986.24		\$7,545.93
68-D5-0141	T2817	04/01/1998	131.53	75.14	30.53%	63.10
	T2820	04/06/1998	1,762.00	1,006.58	30.53%	845.25
			1,893.53	1,081.72		\$908.35
68-D6-0005	ESTW0181	03/10/1998	234.73	296.71	30.53%	162.25
	6132844R1	04/29/1998	160.41	202.76	30.53%	110.88
	06134026	05/08/1998	3,752.03	4,742.72	30.53%	2,593.45
			4,147.17	5,242.19		\$2,866.58

Reconciliation Pending

EPA Indirect Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

OTHER DIRECT COSTS

<u>Contract, IAG, SCA, Misc.NO</u>	<u>Voucher Number</u>	<u>Treasury Schedule Date</u>	<u>Site Amount</u>	<u>Annual/SMO Allocation Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
68-W4-0016	38	10/10/1997	171.99	92.46	30.53%	80.74
			171.99	92.46		\$80.74
Total Fiscal Year 1998 Other Direct Costs:			22,816.59	15,901.73		\$11,820.71
Total Fiscal Year 1998:			40,805.77			\$12,458.02

PAYROLL DIRECT COSTS

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
FOSTER, ALTHEA	1999	15	271.69	25.69%	69.80
		16	585.10	25.69%	150.31
		17	233.64	25.69%	60.02
		18	41.79	25.69%	10.74
		22	41.79	25.69%	10.74
			1,174.01		\$301.61
Total Fiscal Year 1999 Payroll Direct Costs:			1,174.01		\$301.61

TRAVEL DIRECT COSTS

<u>Traveler/Vendor Name</u>	<u>Travel Number</u>	<u>Treasury Schedule Date</u>	<u>Travel Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
FOSTER, ALTHEA	T6636369	05/17/1999	15.50	25.69%	3.98
			15.50		\$3.98
Total Fiscal Year 1999 Travel Direct Costs:			15.50		\$3.98

Reconciliation Pending

EPA Indirect Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

OTHER DIRECT COSTS

Contract, IAG, SCA, Misc.NO	Voucher Number	Treasury Schedule Date	Site Amount	Annual/SMO Allocation Costs	Ind. Rate (%)	Indirect Costs
68-W4-0016	53	01/19/1999	147.10	94.01	25.69%	61.94
	54	02/23/1999	67.47	53.90	25.69%	31.18
			214.57	147.91		\$93.12

Total Fiscal Year 1999 Other Direct Costs:	214.57	147.91	\$93.12
--	--------	--------	---------

Total Fiscal Year 1999:	1,551.99	\$398.71
-------------------------	----------	----------

OTHER DIRECT COSTS

Contract, IAG, SCA, Misc.NO	Voucher Number	Treasury Schedule Date	Site Amount	Annual/SMO Allocation Costs	Ind. Rate (%)	Indirect Costs
68-D6-0005	74	06/12/2001	75.44	97.13	42.14%	72.72
			75.44	97.13		\$72.72

Total Fiscal Year 2001 Other Direct Costs:	75.44	97.13	\$72.72
--	-------	-------	---------

Total Fiscal Year 2001:	172.57	\$72.72
-------------------------	--------	---------

OTHER DIRECT COSTS

Contract, IAG, SCA, Misc.NO	Voucher Number	Treasury Schedule Date	Site Amount	Annual/SMO Allocation Costs	Ind. Rate (%)	Indirect Costs
68-D4-0104	1-34R2	04/15/2002	42.73	24.91	48.57%	32.85
			42.73	24.91		\$32.85

68-W0-0091	1260-11	05/10/2002	552.06	127.61	48.57%	330.12
	1260-13	07/03/2002	6.96	1.61	48.57%	4.16
	1260-12	07/17/2002	420.07	97.10	48.57%	251.19

Reconciliation Pending

EPA Indirect Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

OTHER DIRECT COSTS

Contract, IAG, SCA, Misc.NO	Voucher Number	Treasury Schedule Date	Site Amount	Annual/SMO Allocation Costs	Ind. Rate (%)	Indirect Costs
68-W0-0091	1260-14	08/01/2002	85.55	19.77	48.57%	51.15
	1260-15	08/28/2002	142.11	32.85	48.57%	84.98
	1260-16	09/26/2002	36.23	8.37	48.57%	21.66
			1,242.98	287.31		\$743.26

Total Fiscal Year 2002 Other Direct Costs:	1,285.71	312.22	\$776.11
--	----------	--------	----------

Total Fiscal Year 2002:	1,597.93	\$776.11
-------------------------	----------	----------

OTHER DIRECT COSTS

Contract, IAG, SCA, Misc.NO	Voucher Number	Treasury Schedule Date	Site Amount	Annual/SMO Allocation Costs	Ind. Rate (%)	Indirect Costs
EPR60801	8-10267-21	02/04/2010	7.25	0.00	36.66%	2.66
	770626	04/21/2010	796.67	0.00	36.66%	292.06
	811373	05/12/2010	836.20	0.00	36.66%	306.55
			1,640.12	0.00		\$601.27

Total Fiscal Year 2010 Other Direct Costs:	1,640.12	0.00	\$601.27
--	----------	------	----------

Total Fiscal Year 2010:	1,640.12	\$601.27
-------------------------	----------	----------

OTHER DIRECT COSTS

Contract, IAG, SCA, Misc.NO	Voucher Number	Treasury Schedule Date	Site Amount	Annual/SMO Allocation Costs	Ind. Rate (%)	Indirect Costs
EPW10011	49	05/15/2014	305.59	261.84	64.12%	363.84

Reconciliation Pending

EPA Indirect Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

OTHER DIRECT COSTS

Contract, IAG, SCA, Misc.NO	Voucher Number	Treasury Schedule Date	Site Amount	Annual/SMO Allocation Costs	Ind. Rate (%)	Indirect Costs
EPW10011	52	07/10/2014	483.93	414.64	64.12%	576.16
			789.52	676.48		\$940.00
Total Fiscal Year 2014 Other Direct Costs:			789.52	676.48		\$940.00
Total Fiscal Year 2014:			1,466.00			\$940.00

PAYROLL DIRECT COSTS

Employee Name	Fiscal Year	Pay Period	Payroll Costs	Ind. Rate (%)	Indirect Costs
FIFE, GREGORY	2017	20	299.01	47.16%	141.01
			299.01		\$141.01
MOORE, GARY	2017	23	758.67	47.16%	357.79
		24	254.16	47.16%	119.86
			1,012.83		\$477.65
Total Fiscal Year 2017 Payroll Direct Costs:			1,311.84		\$618.66
Total Fiscal Year 2017:			1,311.84		\$618.66

PAYROLL DIRECT COSTS

Employee Name	Fiscal Year	Pay Period	Payroll Costs	Ind. Rate (%)	Indirect Costs
DELGADO, COURTNEY	2018	25	433.37	60.71%	263.10

Reconciliation Pending

EPA Indirect Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

PAYROLL DIRECT COSTS

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
DELGADO, COURTNEY	2018	26	1,950.17	60.71%	1,183.95
			2,383.54		\$1,447.05
EPPLER, DAVID	2018	14	592.41	60.71%	359.65
		15	740.50	60.71%	449.56
		16	593.18	60.71%	360.12
		17	370.73	60.71%	225.07
		24	593.18	60.71%	360.12
		25	2,150.26	60.71%	1,305.42
		26	3,559.05	60.71%	2,160.70
			8,599.31		\$5,220.64
MOORE, GARY	2018	08	326.96	60.71%	198.50
		09	81.74	60.71%	49.62
		10	1,716.60	60.71%	1,042.15
		12	653.98	60.71%	397.03
		13	1,389.61	60.71%	843.63
		15	735.67	60.71%	446.63
		16	3,269.69	60.71%	1,985.03
		17	245.23	60.71%	148.88
		19	163.48	60.71%	99.25
		22	1,226.15	60.71%	744.40
		23	1,961.87	60.71%	1,191.05
		24	2,615.76	60.71%	1,588.03
		25	735.68	60.71%	446.63
		26	4,127.99	60.71%	2,506.10
			19,250.41		\$11,686.93
SCHILLING, LEONARD	2018	24	454.14	60.71%	275.71
		25	817.45	60.71%	496.27

Reconciliation Pending

EPA Indirect Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

PAYROLL DIRECT COSTS

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
SCHILLING, LEONARD	2018	26	317.90	60.71%	193.00
			1,589.49		\$964.98
TURNER, PHILIP	2018	24	140.53	60.71%	85.32
		25	105.41	60.71%	63.99
			245.94		\$149.31
Total Fiscal Year 2018 Payroll Direct Costs:			32,068.69		\$19,468.91

OTHER DIRECT COSTS

<u>Contract, IAG, SCA, Misc.NO</u>	<u>Voucher Number</u>	<u>Treasury Schedule Date</u>	<u>Site Amount</u>	<u>Annual/SMO Allocation Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
B8BK0005463	1760157	05/24/2018	1.00	0.00	60.71%	0.61
	1760158	05/24/2018	25.00	0.00	60.71%	15.18
			26.00	0.00		\$15.79
EPS51702	1-01	11/15/2017	2,979.96	0.00	60.71%	1,809.13
	1-02	12/12/2017	2,458.27	0.00	60.71%	1,492.42
	1-04	02/13/2018	122.14	0.00	60.71%	74.15
	1-05	03/14/2018	2,081.94	0.00	60.71%	1,263.95
	1-06	04/09/2018	5,663.48	0.00	60.71%	3,438.30
	1-07	05/09/2018	5,692.10	0.00	60.71%	3,455.67
	1-08	06/06/2018	16,407.93	0.00	60.71%	9,961.25
	1-09	07/11/2018	88,970.75	0.00	60.71%	54,014.14
	1-10	08/08/2018	64,173.52	0.00	60.71%	38,959.74
	1-12	09/28/2018	1,388.88	0.00	60.71%	843.19

Reconciliation Pending

EPA Indirect Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

OTHER DIRECT COSTS

Contract, IAG, SCA, Misc.NO	Voucher Number	Treasury Schedule Date	Site Amount	Annual/SMO Allocation Costs	Ind. Rate (%)	Indirect Costs
EPS51702	1-11	09/28/2018	16,974.29	0.00	60.71%	10,305.09
			206,913.26	0.00		\$125,617.03
Total Fiscal Year 2018 Other Direct Costs:			206,939.26	0.00		\$125,632.82
Total Fiscal Year 2018:			239,007.95			\$145,101.73

PAYROLL DIRECT COSTS

Employee Name	Fiscal Year	Pay Period	Payroll Costs	Ind. Rate (%)	Indirect Costs
BRESCIA, NICOLAS	2019	09	1,442.29	53.75%	775.23
		10	3,981.95	53.75%	2,140.30
			5,424.24		\$2,915.53
COOK, BRENDA	2019	05	618.19	53.75%	332.28
			618.19		\$332.28
DELGADO, COURTNEY	2019	01	532.78	53.75%	286.37
		02	1,083.43	53.75%	582.34
		03	3,322.50	53.75%	1,785.84
		04	1,661.26	53.75%	892.93
		05	4,117.03	53.75%	2,212.90
		06	5,128.20	53.75%	2,756.41
		07	2,192.22	53.75%	1,178.32
		08	2,580.78	53.75%	1,387.17
		10	2,782.91	53.75%	1,495.81
		11	2,089.10	53.75%	1,122.89
		14	619.49	53.75%	332.98
		15	929.23	53.75%	499.46

Reconciliation Pending

EPA Indirect Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

PAYROLL DIRECT COSTS

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
DELGADO, COURTNEY	2019	16	1,316.42	53.75%	707.58
		17	464.63	53.75%	249.74
		19	1,084.10	53.75%	582.70
		21	774.69	53.75%	416.40
		23	1,451.93	53.75%	780.41
		24	1,335.78	53.75%	717.98
		25	1,388.88	53.75%	746.52
		26	1,388.88	53.75%	746.52
			<u>36,244.24</u>		<u>\$19,481.27</u>
EPPLER, DAVID	2019	01	2,261.49	53.75%	1,215.55
		02	963.91	53.75%	518.10
		03	444.88	53.75%	239.12
		10	301.16	53.75%	161.87
		12	264.39	53.75%	142.11
		13	151.06	53.75%	81.19
		17	604.83	53.75%	325.10
		18	1,285.26	53.75%	690.83
		19	907.23	53.75%	487.64
		20	756.05	53.75%	406.38
		22	604.83	53.75%	325.10
		24	415.82	53.75%	223.50
		25	604.83	53.75%	325.10
		26	226.81	53.75%	121.91
		27	226.81	53.75%	121.91
			<u>10,019.36</u>		<u>\$5,385.41</u>
FISHER, KELSEY	2019	06	630.62	53.75%	338.96
		07	108.51	53.75%	58.32

Reconciliation Pending

EPA Indirect Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

PAYROLL DIRECT COSTS

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
FISHER, KELSEY	2019	10	320.47	53.75%	172.25
			1,059.60		\$569.53
LOESEL, MATTHEW	2019	07	319.63	53.75%	171.80
			319.63		\$171.80
MARTIN, JOHN	2019	04	1,344.37	53.75%	722.60
		06	635.14	53.75%	341.39
		08	77.29	53.75%	41.54
			2,056.80		\$1,105.53
MOORE, GARY	2019	01	1,979.43	53.75%	1,063.94
		02	408.70	53.75%	219.68
		03	3,270.24	53.75%	1,757.75
		04	1,957.54	53.75%	1,052.18
		05	4,365.76	53.75%	2,346.60
		06	3,572.55	53.75%	1,920.25
		08	3,162.83	53.75%	1,700.02
		09	4,598.66	53.75%	2,471.78
		10	595.38	53.75%	320.02
		11	2,725.13	53.75%	1,464.76
		12	3,814.10	53.75%	2,050.08
		13	2,483.62	53.75%	1,334.95
		16	976.88	53.75%	525.07
		17	177.54	53.75%	95.43
		18	88.77	53.75%	47.71
		19	932.06	53.75%	500.98
		23	621.38	53.75%	333.99

Reconciliation Pending

EPA Indirect Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

PAYROLL DIRECT COSTS

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
MOORE, GARY	2019	26	532.61	53.75%	286.28
			36,263.18		\$19,491.47
PATEL, ANISH	2019	06	834.83	53.75%	448.72
		07	108.51	53.75%	58.32
			943.34		\$507.04
PETERSEN, JAY	2019	03	322.30	53.75%	173.24
		04	564.02	53.75%	303.16
		05	402.88	53.75%	216.55
		06	805.92	53.75%	433.18
		10	656.66	53.75%	352.95
		11	492.76	53.75%	264.86
		12	82.13	53.75%	44.14
		13	41.06	53.75%	22.07
		18	164.26	53.75%	88.29
			3,531.99		\$1,898.44
ROBERTSON, DAVID	2019	06	680.53	53.75%	365.78
		10	760.66	53.75%	408.85
			1,441.19		\$774.63
SCHILLING, LEONARD	2019	01	272.48	53.75%	146.46
		02	1,771.09	53.75%	951.96
		03	622.01	53.75%	334.33
		04	1,217.95	53.75%	654.65
		05	1,652.90	53.75%	888.43
		10	369.56	53.75%	198.64
		11	277.66	53.75%	149.24
		12	555.32	53.75%	298.48

Reconciliation Pending

EPA Indirect Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

PAYROLL DIRECT COSTS

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
SCHILLING, LEONARD	2019	13	277.66	53.75%	149.24
		14	92.63	53.75%	49.79
		15	324.18	53.75%	174.25
		17	370.50	53.75%	199.14
		18	277.87	53.75%	149.36
		19	185.26	53.75%	99.58
		20	463.12	53.75%	248.93
		21	92.75	53.75%	49.85
		22	370.50	53.75%	199.14
		25	92.62	53.75%	49.78
		26	92.63	53.75%	49.79
			<u>9,378.69</u>		<u>\$5,041.04</u>
SPENCER, KELVIN	2019	02	64.87	53.75%	34.87
		03	129.74	53.75%	69.74
			<u>194.61</u>		<u>\$104.61</u>
TURNER, PHILIP	2019	02	298.65	53.75%	160.52
			<u>298.65</u>		<u>\$160.52</u>
WEBSTER, SUSAN	2019	06	513.14	53.75%	275.81
		10	365.04	53.75%	196.21
		11	274.13	53.75%	147.34
		13	137.08	53.75%	73.68
		18	963.74	53.75%	518.01
			<u>2,253.13</u>		<u>\$1,211.05</u>
Total Fiscal Year 2019 Payroll Direct Costs:			<u><u>110,046.84</u></u>		<u><u>\$59,150.15</u></u>

Reconciliation Pending

EPA Indirect Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

TRAVEL DIRECT COSTS

<u>Traveler/Vendor Name</u>	<u>Travel Number</u>	<u>Treasury Schedule Date</u>	<u>Travel Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
COOK, BRENDA	TAA06NPT	12/07/2018	24.00	53.75%	12.90
			31.59	53.75%	16.98
		02/15/2019	14.75	53.75%	7.93
			<u>70.34</u>		<u>\$37.81</u>
DELGADO, COURTNEY	TAA06GAO	10/09/2018	73.13	53.75%	39.31
			14.75	53.75%	7.93
	TAA06KP8	11/09/2018	14.75	53.75%	7.93
			65.40	53.75%	35.15
			<u>168.03</u>		<u>\$90.32</u>
MARTIN, JOHN	TAA06NKL	11/28/2018	6.80	53.75%	3.66
			43.60	53.75%	23.44
	TAA06NZR	12/04/2018	6.80	53.75%	3.66
			43.60	53.75%	23.44
	TAA06RMU	02/11/2019	6.80	53.75%	3.66
	TAA06RN3	02/11/2019	46.40	53.75%	24.94
	TAA06RMU	02/11/2019	6.80	53.75%	3.66
			46.40	53.75%	24.94
			<u>207.20</u>		<u>\$111.40</u>
	TAA06HEL	10/04/2018	6.80	53.75%	3.66
MOORE, GARY		10/05/2018	170.59	53.75%	91.69
TAA06IFB	10/15/2018	101.38	53.75%	54.49	
		6.80	53.75%	3.66	
TAA06UWA	03/12/2019	157.18	53.75%	84.48	
		6.80	53.75%	3.66	
TAA06X3L	03/25/2019	6.80	53.75%	3.66	
		316.10	53.75%	169.90	
TAA06ZJQ	04/12/2019	6.80	53.75%	3.66	
		157.18	53.75%	84.48	

Reconciliation Pending

EPA Indirect Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

TRAVEL DIRECT COSTS

Traveler/Vendor Name	Travel Number	Treasury Schedule Date	Travel Costs	Ind. Rate (%)	Indirect Costs
MOORE, GARY	TAA07977	06/12/2019	103.82	53.75%	55.80
			6.80	53.75%	3.66
	TAA07L0B	08/29/2019	6.80	53.75%	3.66
			52.78	53.75%	28.37
			1,106.63		\$594.83
ROBERTSON, DAVID	TAA06SUX	02/28/2019	108.75	53.75%	58.46
			221.12	53.75%	118.85
			329.87		\$177.31
Total Fiscal Year 2019 Travel Direct Costs:			1,882.07		\$1,011.67

OTHER DIRECT COSTS

<u>Contract, IAG, SCA, Misc.NO</u>	<u>Voucher Number</u>	<u>Treasury Schedule Date</u>	<u>Site Amount</u>	<u>Annual/SMO Allocation Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
B9BK0006139	1803257	04/25/2019	96.00	0.00	53.75%	51.60
			<u>96.00</u>	<u>0.00</u>		<u>\$51.60</u>
EPS41604	60308-01	01/22/2019	112,927.61	4,067.77	53.75%	62,885.02
	60308-02	01/28/2019	204,578.24	7,369.11	53.75%	113,921.70
	60308-03	03/06/2019	603,160.27	21,726.44	53.75%	335,876.61
	60308-04	04/22/2019	578,189.57	20,826.97	53.75%	321,971.39
	60308-05	05/20/2019	79,419.09	2,860.76	53.75%	44,225.42
	60308-06	06/21/2019	14,771.28	532.08	53.75%	8,225.56
			<u>1,593,046.06</u>	<u>57,383.13</u>		<u>\$887,105.70</u>
EPS51701	20	11/06/2018	604.26	206.69	53.75%	435.89
			42.75	14.62	53.75%	30.84

Reconciliation Pending

EPA Indirect Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

OTHER DIRECT COSTS

Contract, IAG, SCA, Misc.NO	Voucher Number	Treasury Schedule Date	Site Amount	Annual/SMO Allocation Costs	Ind. Rate (%)	Indirect Costs
EPS51701	22	02/04/2019	1,183.21	404.71	53.75%	853.51
	23	02/19/2019	17.83	6.10	53.75%	12.86
			12.66	4.33	53.75%	9.13
	24	03/28/2019	8.92	3.05	53.75%	6.43
	25	04/10/2019	18.36	6.28	53.75%	13.24
	26	05/06/2019	437.61	149.68	53.75%	315.67
	27	06/04/2019	437.61	149.68	53.75%	315.67
	28	07/02/2019	2,141.58	732.52	53.75%	1,544.83
			248.88	85.13	53.75%	179.53
	29	08/02/2019	1,408.41	481.74	53.75%	1,015.96
			466.50	159.56	53.75%	336.51
	30	09/09/2019	17,126.87	5,858.19	53.75%	12,354.47
			24,155.45	8,262.28		\$17,424.54
EPS51702	1-13	11/15/2018	5,550.41	0.00	53.75%	2,983.35
	1-14R	12/10/2018	16,118.74	0.00	53.75%	8,663.82
			235.55	0.00	53.75%	126.61
	1-15	01/28/2019	27,848.35	0.00	53.75%	14,968.49
			6,909.74	0.00	53.75%	3,713.99
	1-16	02/11/2019	53,508.89	0.00	53.75%	28,761.03
			4,117.08	0.00	53.75%	2,212.93
	1-17	03/06/2019	36,434.20	0.00	53.75%	19,583.38
	1-18	04/04/2019	57,738.22	0.00	53.75%	31,034.29
			6,481.86	0.00	53.75%	3,484.00
	1-19	05/08/2019	23,624.75	0.00	53.75%	12,698.30
			6,940.68	0.00	53.75%	3,730.62
	1-20	06/05/2019	8,158.59	0.00	53.75%	4,385.24
	1-21	07/01/2019	6,966.18	0.00	53.75%	3,744.32
	1-22	08/12/2019	8,376.68	0.00	53.75%	4,502.47

Reconciliation Pending

EPA Indirect Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

OTHER DIRECT COSTS

Contract, IAG, SCA, Misc.NO	Voucher Number	Treasury Schedule Date	Site Amount	Annual/SMO Allocation Costs	Ind. Rate (%)	Indirect Costs
EPS51702	1-23	09/11/2019	990.16	0.00	53.75%	532.21
			270,000.08	0.00		\$145,125.05
Total Fiscal Year 2019 Other Direct Costs:			1,887,297.59	65,645.41		\$1,049,706.89
Total Fiscal Year 2019:			2,064,871.91			\$1,109,868.71

PAYROLL DIRECT COSTS

Employee Name	Fiscal Year	Pay Period	Payroll Costs	Ind. Rate (%)	Indirect Costs
DELGADO, COURTNEY	2020	02	726.11	53.75%	390.28
		03	879.04	53.75%	472.48
		05	764.32	53.75%	410.82
			2,369.47		\$1,273.58
EPPLER, DAVID	2020	01	453.62	53.75%	243.82
		03	230.59	53.75%	123.94
		04	614.91	53.75%	330.51
		05	614.91	53.75%	330.51
		06	383.01	53.75%	205.87
		08	2,360.96	53.75%	1,269.02
		09	40.71	53.75%	21.88
		12	244.22	53.75%	131.27
		15	203.53	53.75%	109.40
		16	651.31	53.75%	350.08
		18	1,058.36	53.75%	568.87
		19	1,465.41	53.75%	787.66
		20	814.12	53.75%	437.59
		21	1,345.04	53.75%	722.96
		22	1,709.66	53.75%	918.94

Reconciliation Pending

EPA Indirect Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

PAYROLL DIRECT COSTS

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
EPPLER, DAVID	2020	23	651.31	53.75%	350.08
			12,841.67		\$6,902.40
MOORE, GARY	2020	10	186.46	53.75%	100.22
		11	326.35	53.75%	175.41
		12	139.87	53.75%	75.18
		13	1,771.64	53.75%	952.26
		15	1,072.32	53.75%	576.37
		16	46.64	53.75%	25.07
		17	1,631.76	53.75%	877.07
		18	792.59	53.75%	426.02
		19	1,398.67	53.75%	751.79
		20	1,072.30	53.75%	576.36
		21	419.95	53.75%	225.72
		22	93.23	53.75%	50.11
		23	559.47	53.75%	300.72
			9,511.25		\$5,112.30
PETERSEN, JAY	2020	12	211.82	53.75%	113.85
			211.82		\$113.85
SCHILLING, LEONARD	2020	08	194.62	53.75%	104.61
		09	778.48	53.75%	418.43
		10	1,096.64	53.75%	589.44
		11	1,395.72	53.75%	750.20
		12	1,395.71	53.75%	750.19
		14	199.39	53.75%	107.17
		15	996.96	53.75%	535.87
		16	299.08	53.75%	160.76
		19	299.07	53.75%	160.75

Reconciliation Pending

EPA Indirect Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D
 UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020
 DEMAND LETTER

PAYROLL DIRECT COSTS

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
SCHILLING, LEONARD	2020	20	498.47	53.75%	267.93
			7,154.14		\$3,845.35
Total Fiscal Year 2020 Payroll Direct Costs:			32,088.35		\$17,247.48

OTHER DIRECT COSTS

<u>Contract, IAG, SCA, Misc.NO</u>	<u>Voucher Number</u>	<u>Treasury Schedule Date</u>	<u>Site Amount</u>	<u>Annual/SMO Allocation Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
EPS41604	60308-07	10/21/2019	5,724.17	206.19	53.75%	3,187.57
	60308-08	11/21/2019	90.40	3.26	53.75%	50.34
			5,814.57	209.45		\$3,237.91
EPS51701	31	10/07/2019	-17,126.87	-5,858.19	53.75%	-12,354.47
			4,789.92	1,638.38	53.75%	3,455.21
			17,126.87	5,858.19	53.75%	12,354.47
	32	11/01/2019	84.40	28.87	53.75%	60.88
	00033	12/12/2019	36.73	12.56	53.75%	26.49
	34	01/09/2020	172.45	58.99	53.75%	124.40
	00035	02/10/2020	592.85	202.78	53.75%	427.65
	EPS51701_36_00005	03/13/2020	1,612.38	551.51	53.75%	1,163.09
	EPS51701_37_00001	03/27/2020	91.06	31.15	53.75%	65.69
	EPS51701_38_00005	04/02/2020	5.37	1.84	53.75%	3.88
	EPS51701_38_00001	04/02/2020	50.92	17.42	53.75%	36.73
	EPS51701_39_00001	05/11/2020	352.50	120.57	53.75%	254.28
	EPS51701_40_00001	06/04/2020	250.74	85.76	53.75%	180.87
	EPS51701_42_00001	08/13/2020	7.54	2.58	53.75%	5.44
			8,046.86	2,752.41		\$5,804.61
EPS51702	1-24	10/01/2019	748.97	0.00	53.75%	402.57

Reconciliation Pending

EPA Indirect Costs

DOYLE, FRANK J. (TRANSFORMER), LEONARD, TX SITE ID = 06 1D

UNRECONCILED COST FROM INCEPTION THROUGH 08/31/2020

DEMAND LETTER

OTHER DIRECT COSTS

Contract, IAG, SCA, Misc.NO	Voucher Number	Treasury Schedule Date	Site Amount	Annual/SMO Allocation Costs	Ind. Rate (%)	Indirect Costs
EPS51702	1-25	11/07/2019	89.95	0.00	53.75%	48.35
	0001-32	05/06/2020	345.89	0.00	53.75%	185.92
	0001-33	06/03/2020	8,220.85	0.00	53.75%	4,418.71
	0001-34	07/01/2020	12,080.66	0.00	53.75%	6,493.35
	0001-35	08/03/2020	25,114.54	0.00	53.75%	13,499.07
			46,600.86	0.00		\$25,047.97
Total Fiscal Year 2020 Other Direct Costs:			60,462.29	2,961.86		\$34,090.49
Total Fiscal Year 2020:			95,512.50			\$51,337.97
Total EPA Indirect Costs						\$1,334,115.79

ENCLOSURE 3

LIST OF POTENTIALLY RESPONSIBLE PARTIES F. J. DOYLE SALVAGE SUPERFUND SITE

PARTIES RECEIVING THIS LETTER

Ms. Elizabeth Gunter
Senior Counsel
AEP Legal
for SWEPCO and Public Service Co. of
Oklahoma
400 West 15th Street
Austin, Texas 78700

Mr. Daryll Schriver
CEO and General Manager
Tri-County Electric Cooperative, Inc.
600 N W Parkway
Azle, Texas 76020

Mr. David W. Mitchell
Senior Council, Environmental
Vistra Energy
Texas Power & Light Company, Inc.
6555 Sierra Drive
Irving, Texas 75039

Duncan C. Norton
Samuel L. Ballard
Counsel for City of Garland
Garland Power & Light
Lloyd Gosselink Rochelle & Townsend, P.C.
816 Congress Ave., Suite 1900
Austin, Texas 78701

Mr. Larry D. Ogden
Lighthouse Electric Cooperative, Inc.
P.O. Box 600
Floydada, Texas 79235-0600

Mr. Samuel Wise
Manager Waste & Water
Cleco Corporation
PO Box 5000
Pineville, LA 71361-5000

Mr. Michael Neely
Manager of General Services
Yazoo Valley Electric Power Association
P. O. Box 8
Yazoo City, Mississippi 39194

Counsel for Entergy Services
for Louisiana Power & Light
and successors in interest to Gulf States Utility
Company
Steve Morton, Partner
K&L Gates, LLP
2801 Via Fortuna, Suite 350
Austin, Texas 78746

ENCLOSURE 4

SMALL BUSINESS RESOURCES INFORMATION SHEET
F. J. DOYLE SUPERFUND SITE

U.S. EPA Small Business Resources Information Sheet

The United States Environmental Protection Agency provides an array of resources to help small businesses understand and comply with federal and state environmental laws. In addition to helping small businesses understand their environmental obligations and improve compliance, these resources will also help such businesses find cost-effective ways to comply through pollution prevention techniques and innovative technologies.

Office of Small and Disadvantaged Business Utilization (OSDBU)

<https://www.epa.gov/aboutepa/about-office-small-and-disadvantaged-business-utilization-osdbu>

EPA's OSDBU advocates and advances business, regulatory, and environmental compliance concerns of small and socio-economically disadvantaged businesses.

EPA's Asbestos Small Business Ombudsman (ASBO)

<https://www.epa.gov/resources-small-businesses/asbestos-small-business-ombudsman> or 1-800-368-5888

The EPA ASBO serves as a conduit for small businesses to access EPA and facilitates communications between the small business community and the Agency.

Small Business Environmental Assistance Program

<https://nationalsbeap.org>

This program provides a "one-stop shop" for small businesses and assistance providers seeking information on a wide range of environmental topics and state-specific environmental compliance assistance resources.

EPA's Compliance Assistance Homepage

<https://www.epa.gov/compliance>

This page is a gateway to industry and statute-specific environmental resources, from extensive web-based information to hotlines and compliance assistance specialists.

Compliance Assistance Centers

<https://www.complianceassistance.net>

EPA-sponsored Compliance Assistance Centers provide the information you need, in a way that helps make sense of environmental regulations. Each Center addresses real world issues faced by a specific industry or government sector. They were developed in partnership with industry, universities and other federal and state agencies.

Agriculture

<https://www.epa.gov/agriculture>

Automotive Recycling

<http://www.ecarcenter.org>

Automotive Service and Repair

<https://ecar-greenlink.org> or 1-888-GRN-LINK

Combustion—Boilers, Generators, Incinerators, Wood Heaters

<https://www.combustionportal.org/>

Construction

<http://www.cicacenter.org>

Education

<https://www.nacubpo.org/>

Healthcare

<http://www.hercenter.org>

Local Government

<https://www.lgcen.net/>

Oil/ Natural Gas Energy Extraction

<https://www.ecice.org/>

Paints and Coatings

<https://www.paintcenter.org/>

Ports

<https://www.portcompliance.org/>

Surface Finishing

<http://www.sterc.org/>

Transportation

<https://www.tcccenter.org/>

U.S. Border Compliance and Import/Export Issues

<https://www.bordercenter.org/>

Veterinary Care

<https://www.vetecol.org/>

EPA Hotlines and Clearinghouses

www.epa.gov/home/epa-hotlines

EPA sponsors many free hotlines and clearinghouses that provide convenient assistance regarding environmental requirements. Examples include:

Clean Air Technology Center (CATC) Info-line

www.epa.gov/cata or 1-919-541-0800

Superfund, TRI, EPCRA, RMP, and Oil Information Center

1-800-424-9346

EPA Imported Vehicles and Engines Public Helpline

www.epa.gov/otaq/imports or 1-734-214-4100

National Pesticide Information Center

www.npic.orst.edu or 1-800-858-7378

National Response Center Hotline to report oil and hazardous substance spills - <http://nrc.uscg.mil> or 1-800-424-8802

Pollution Prevention Information Clearinghouse (PPIC) -

www.epa.gov/p2/pollution-prevention-resources/ppic or 1-202-566-0799

Safe Drinking Water Hotline -

www.epa.gov/ground-water-and-drinking-water/safe-drinking-water-hotline or 1-800-426-4791

Toxic Substances Control Act (TSCA) Hotline

tsc hotline@epa.gov or 1-202-554-1404

U.S. Small Business Resources

Small Entity Compliance Guides

<https://www.epa.gov/reg-flex/small-entity-compliance-guides>

EPA publishes a Small Entity Compliance Guide (SECG) for every rule for which the Agency has prepared a final regulatory flexibility analysis, in accordance with Section 604 of the Regulatory Flexibility Act (RFA).

Regional Small Business Liaisons

www.epa.gov/resources-small-businesses/epa-regional-office-small-business-liaisons

The U.S. Environmental Protection Agency (EPA) Regional Small Business Liaison (RSBL) is the primary regional contact and often the expert on small business assistance, advocacy, and outreach. The RSBL is the regional voice for the EPA Asbestos and Small Business Ombudsman (ASBO).

State Resource Locators

www.enveap.org/statetools

The Locators provide state-specific information on regulations and resources covering the major environmental laws.

State Small Business Environmental Assistance Programs (SBEAPs)

<http://www.nationalsbeap.org/states/list>

State SBEAPs help small businesses and assistance providers understand environmental requirements and sustainable business practices through workshops, trainings and site visits.

EPA's Tribal Portal

<https://www.epa.gov/tribal>

The Portal helps users locate tribal-related information within EPA and other federal agencies.

EPA Compliance Incentives

EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations before an enforcement action has been initiated, businesses may be eligible for penalty waivers or reductions. EPA has several such policies that may apply to small businesses. More information is available at:

- **EPA's Small Business Compliance Policy**
<https://www.epa.gov/compliance/small-business-compliance>
- **EPA's Audit Policy**
www.epa.gov/compliance/epas-audit-policy

Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established a Small Business Administration (SBA) National Ombudsman and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. If you believe that you fall within the SBA's definition of a small business (based on your North American Industry Classification System designation, number of employees or annual receipts, as defined at 13 C.F.R. 121.201; in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, you can call the SBA National Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247), or submit a comment online at <https://www.sba.gov/about-sba/oversight-advocacy/office-national-ombudsman>.

Every small business that is the subject of an enforcement or compliance action is entitled to comment on the Agency's actions without fear of retaliation. EPA employees are prohibited from using enforcement or any other means of retaliation against any member of the regulated community in response to comments made under SBREFA.

Your Duty to Comply

If you receive compliance assistance or submit a comment to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act or related provisions.